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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

111 West Jackson Blvd. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

JUL 1 5 1982

William Samples, Env. Control Pittsburgh-Canfield Corporation 1134 Market Street Wheeling, West Virginia 26003

RE: Interim Status Acknowledgement

USEPA ID No. OHDOOO810283

FACILITY NAME: Pittsburgh-Canfield Corporation

Dear Mr. Samples:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely.

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

Enclosure

cc: R. C. McLean, Vice President-Operations

FACILITY NAME

EPA ID NUMBER

PITTSBURGH-CANFIELD. CORPORATION

OHD000810283

FACILITY OPERATOR

WHEELING-PITTSBURGH STEEL CORP

FACILITY OWNER

WHELLING-PITTSBURGH STEEL CORP

FACILITY LOCATION

460 WEST MAIN STREET

CANFIELD

OH 44406

PROCESS CODE

DESIGN CAPACITY

UNIT OF MEASURE

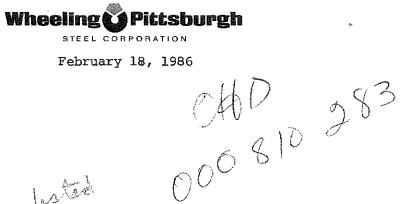
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| PROCESS | | APPROPRIATE UNITS OF MEASURE | * * * | UNIT OF MEASURE | CODE |
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or S



STEEL CORPORATION

February 18, 1986

RCRA Activities Region V - USEPA

P. O. Box A3587

Chicago, ILL 60690 Attention: ATKJG

PITTSBURGH-CANFIELD CORPORATION

USEPA I.D. NO. OHD000810283 (5HS-JCK-13)

CONTINUING RELEASES AT PERMITTED FACILITIES

Gentlemen:

We have reviewed the letter from Mr. David A. Stringham, Chief, Solid Waste Branch, dated January 31, 1986, and Section 3004(U), Continuing Releases at Permitted Facilities, of the Resource Conservation Recovery Act, as amended in 1984, to which it refers.

This section specifies that it applies to those facilities that are seeking permits for treatment, storage or disposal of hazardous wastes. The attached correspondence, which was previously submitted to your agency, describes both the background and status of the facility which was the subject of our Part A Application. As the correspondence indicates, we ceased use of the facility for the treatment of hazardous waste prior to September 29, 1982, and, therefore, no longer require a permit.

However, please be assured that there were no releases of hazardous waste or hazardous constituent that would threaten public health or the environment during or subsequent to the time the facility was operated as a permitted treatment facility.

If any other information is required, please contact us.

Very truly yours,

W. R. Samples

Interim Manager -

Environmental Control and

Corporate Engineering

WRS/nq Attachments



Re: Hazardous Waste Activity Status U.S. EPA I.D. No. OHD000810283

Ohio Permit No. 02-50-0336

April 1, 1985

William R. Samples
Manager-Environmental Control Department'
Wheeling-Pittsburg Steel Corporation
Duvall Center,
Wheeling, W. Va. 26003

Dear Mr. Samples:

According to our records, your Ohio Hazardous Waste Installation & Operation Permit has expired. Prior to the expiration of that permit, you had informed and certified to the Ohio EPA that you no longer conducted hazardous waste activity for which a permit was required.

Therefore, this letter is to inform you that, based on the information you had submitted and an investigation by Agency staff, you will maintain the status of a generator only with less than 90 day storage.

You should continue to use the identification number assigned to you by the U.S. EPA for purposes of compliance with the Ohio EPA manifest, recordkeeping and reporting requirements for generators and transporters of hazardous waste as appropriate.

Should you have any questions concerning your current status, please contact the appropriate Ohio EPA District Office (see enclosed list).

Very truly yours,

Thomas E. Crepeau, Manager

Thomas & Crepeau

Data Management Section

Division of Solid and Hazardous Waste Management

TEC/ds

Enclosure

cc: U.S. EPA, Region V

HWFB D.O.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 50604

REPLY TO ATTENTION OF:

5HW-13



AUG 1 1984
William R. Samples, Manager
Environmental Control Dept.
Wheeling - Pittsburgh Steel Corp.
Duvall Center
Wheeling, West Virginia 26003

RE: Request for Information--Hazardous Waste Permit Review (Storage Fewer Than 90 Days and Wastewater

Treatment Unit)
FACILITY NAME: Pittsburgh - Canfield Corp

U.S. EPA ID NO.: 0HD000810283

Dear Mr. Samples:

This is to acknowledge that the United States Environmental Protection Agency (U.S. EPA) has completed reviewing your Part A Hazardous Waste Permit Application. Our review indicates your facility may not require a permit under Section 3005 of the Resource Conservation and Recovery Act, as amended; however, further clarification is needed.

Based on the information submitted, your facility appears to accumulate wastes generated on-site for fewer than 90 days in containers or tanks, as defined in 40 CFR Part 262.34 (enclosed), and to qualify as a wastewater treatment unit, as defined in 40 CFR Part 260.10 (enclosed), and is excluded from the permit requirements outlined in 40 CFR 270.1 (c)(2)(enclosed). Please review these requirements to determine if your facility qualifies as an accumulation facility from November 19, 1980, to the present, and as a wastewater treatment unit. If it does, a permit is not required, and you should withdraw your permit application. Please submit your determination in writing, signed and certified by an authorized person, in accordance with 40 CFR Part 270.11 (enclosed), requesting that your application be withdrawn. If at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found at 40 CFR Part 265 Subpart G (enclosed).

If the information on your application is incorrect, please submit a revised Part A with the appropriate changes to this Regional Office. If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

Please contact the Regulatory Analysis and Information Unit at (312) 886-6148 for assistance, if you have any questions. Please refer to "Request for Information--Hazardous Waste Permit Review (Storage Fewer Than 90 Days and Wastewater Treatment Unit)," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief Waste Management Branch

Enclosure

cc: Roger C. McLean, Vice President - Operations

We have a new mailing address for all Region V RCRA activities.

RCRA ACTIVITIES
Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

The following RCRA activities should be submitted to the address above:

- a. Inquiries on ID numbers;
- b. Notification of Hazardous Waste Activity (EPA Form 8700-12);
- c. Part A of the RCRA treatment, storage, and/or disposal (TSD) facility permit application, Form 1 (EPA Form 3510-1) and Form 3 (EPA Form 3510-3);
- d. Part B of the RCRA TSD facility permit application;
- e. Additional information/revisions to b, c, and d.
- Manifest reports (exception, discrepancy and unmanifested waste);
- g. Financial responsibility documents; and
- h. Groundwater monitoring reports;
- Closure documents; and
- j. Annual reports.

You may get information and answers to specific questions relating to Interim Status Standards and the Federal hazardous waste management program in your State by calling (312) 353-2197 and asking for RCRA hazardous waste regulations assistance. Region V has numerous technical staff who are available to help industry comply with the hazardous waste regulations under RCRA. Trained professionals provide accurate, up-to-date general information on the regulations and also answer questions regarding specific problems.

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bcc: C. E. Newhouse

M. M. Tradler

R. H. Craig

G. Raynovich, Jr. Master File



August 20, 1984

Mr. Karl J. Klepitsch, Jr. Chief, Waste Management Branch U. S. Environmental Protection Agency Region 5
230 South Dearborn Street Chicago, IL 60604

RE: Pittsburgh-Canfield Corporation

USEPA I.D. No. OHD 000 810 283 - (5HW-13)

Dear Mr. Klepitsch:

This is our response to your letter of August 1, 1984 regarding our status as a treatment, storage or disposal facility for hazardous wastes at our plant in Canfield, Ohio.

Since November 19, 1980, this facility has neither stored hazardous wastes for more than ninety (90) days nor disposed of hazardous wastes. However, we did operate a treatment unit for a period but discontinued the practice in 1982. This facility and its present status is described in the attached letters sent to the Ohio EPA on September 29, 1982 and April 8, 1983.

Based on our review of the RCRA requirements in light of our current hazardous waste practices at the Canfield Plant, we have concluded that we can withdraw our Part A Hazardous Waste Permit Application.

Please direct any comments or questions to Mr. William R. Samples, Manager-Environmental Control.

Very truly yours,

Roger C. McLean

Vice President - Operations

Attachments

UNITED STATES ENVIRONMENTAL PROTECTION AGE. CY REGION V

JUN 3 1986

DATE:

SUBJECT: Submittal of Certified Closure Facilities for Public Notice

FROM: Y. J. Kim, Acting Chief

Technical Programs Section

TO: Judy Kertcher, Chief

Authorization and Information Section

The closure facilities listed below have been found to be acceptable by my staff. The facilities have requested Region V's approval in order to proceed with actual closure of the facility. It is requested that your staff prepare and issue the public notice per 40 CFR 265.112(d).

Please contact Diane Debus at 6-6182 for any additional information.

| | West Alexandria, Lancaster, OH Newark, OH Columbus, OH | (| OHD OHD | 004 004 | 289 495 | 098 419 495 010 |
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STEEL CORPORATION
Wheeling, West Virginia 26003

August 23, 1983

RECEIVED OHIO EPA

AUG 26 1983

Mr. Thomas E. Crepeau
Manager, Permits & Manifest Records Section
Division of Hazardous Materials Management
OHIO ENVIRONMENTAL PROTECTION AGENCY
361 East Broad Street
Columbus, OH 43215

DIV. HAZARDOUS MATERIALS MANAGEMENT

Re: PITTSBURGE-CANFIELD CORPORATION
USEPA I.D. NO. OHD 000810283
HAZARDOUS WASTE TREATMENT FACILITY

PERMIT NO. 02-50-0336

Dear Mr. Crepeau:

As instructed in your letter of August 19, 1983 to William R. Samples, Manager of Environmental Control, please accept this letter as the formal verification that our plant in Canfield, Ohio no longer requires Hazardous Waste Facility Permit No. 02-50-0336.

Operation of the facility which required this permit was discontinued on about September 9, 1982, and an explanation was provided your office by letter dated September 29, 1982. A copy of that letter is attached for ready reference.

If further information is required, please direct all inquiries to the attention of William R. Samples, Manager-Environmental Control Department, Wheeling-Pittsburgh Steel Corporation, Duvall Center, Wheeling, WV 26003

In accordance with your required certification statement, I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Roger C. McLean

Vice President-Operations

Roge C. Mc Lean

August 23, 1983

WRS/RCM/ng Attachment

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M. M. Tradler
R. H. Craig
G. Raynovich, Jr.
Master File



Duvall Center
Wheeling, West Virginia 26003
April 8, 1983

Mrs. Christine Mikoy Frazier
Environmental Scientist
Division of Hazardous Materials Management
Northeast District Office
OHIO ENVIRONMENTAL PROTECTION AGENCY
2110 E. Aurora Road
Twinsburg, OH 44087-1969

Re: PITTSBURGH-CANFIELD CORPORATION HAZARDOUS WASTES - #02-50-0336

Dear Mrs. Frazier:

I apologize for my absence during your most recent inspection of our Canfield Plant. We appreciate your visit and your report, as we consider these a very vital part of our compliance auditing procedure.

The comments which follow are directed to the concerns which you expressed in your inspection report dated March 8, 1983:

(1) Treatment Facility Closure

Attached is our letter of explanation concerning our decision to halt the treatment of hazardous wastes at this plant. Please note that the "system" which was formerly used for treatment is now being used for transfer and temporary storage and will not be closed at this time. If we should decide to cease the use of those facilities, we recognize our obligation under USEPA Regulation 262.34(1) and 265.197 (OEPA 3745-52-34 and 3745-66-97) at the time of closure to remove and properly dispose of all hazardous wastes and hazardous waste residues from the equipment.

We, therefore, do not propose to close the facilities at this time, but rather to simply reclassify them.

Page 2 - April 8, 1983 Mrs. Christine Mikoy Frazier OHIO EPA

PITTSBURGH-CANFIELD CORPORATION HAZARDOUS WASTES - #02-50-0336

(3) Portable Container for Chrome Waste

This container will be marked in the future with the words "Hazardous Waste" and with the accumulation starting date.

(4) Annual Personnel Training

Our Hazardous Waste Manual will be updated and copies will be provided to all appropriate personnel.

(5) Aisle Space

We question the need for modification of our storage procedures for drummed wastes, as it is unlikely that added aisle space will be needed for any of the purposes mentioned in OEPA Regulation #3745-65-35. However, if the need should arise to move any drums to provide better access, equipment is readily available.

(6) Contingency Plan

Our contingency plan will be modified to comply with the requirements of OEPA #3745-65-52.

Again, we appreciate your calling our attention to these matters and trust our explanations and/or proposed actions are adequate. We expect to implement these proposals by May 31, 1983.

Please let us know if you have any further questions.

Very truly yours,

WHEELING-PITTSBURGH STEEL CORPORATION

W. R. Samples

Manager - Environmental Control

It. M. Samples/ng

WRS/ng Attachment

Wheeling Pittsburgh

Duvall Center
Wheeling, West Virginia 26003

September 29, 1982

RECEIVED OHIO EPA

AUG 26 1983

MATERIALS MANAGEMENT

Ohio Environmental Protection Agency Division of Hazardous Materials Management P. O. Box 1049 Columbus, OH 43216

Att: Permits and Manifest Records Section

Re: CANFIELD PLANT
PITTSBURGH-CANFIELD CORPORATION
HAZARDOUS WASTE FACILITY PERMITEPA I.D. NO. OHD 000 810 283

Gentlemen:

On August 12, 1982, we received notice of a \$1500.00 annual fee for our Hazardous Waste facility at the Canfield Plant of Pittsburgh-Canfield Corporation, a Subsidiary of Wheeling-Pittsburgh Steel Corporation.

The hazardous waste facility in question is a small batch treatment unit used for chlorination of wastewater prior to its transport for disposal. Because of the relatively small amount of wastewater involved, alternate disposal facilities have been found which will accept the waste without chlorination. Thus, we no longer require the Hazardous Waste Facility Permit.

The system of tanks, pumps, etc., which have made up the "treatment" facility will now be used as transfer and temporary (less than 90 days) holding facilities prior to the transfer of the wastewater to a tank truck for transport to an approved hazardous waste disposal site. Our facility will not be closed at this time; however, at the cessation of operations involving the hazardous waste, all hazardous waste and hazardous waste residues will be removed from the tanks and appurtenants and disposed of in an approved facility.

Please contact us if you have any questions.

Very truly yours,

I.A. Samples

Manager

Environmental Control

WRS/ng



STEEL CORPORATION

Duvall Center
Wheeling, West Virginia 26003

June 21, 1982

RECEIVED

JUL 2 1982

WASTE MANAGEMENT BRANCH EPA REGION V

U. S. Environmental Protection Agency Region V RCRA Activities P. O. Box 7861 Chicago, ILL 60680

7/04/82

Re: PITTSBURGH-CANFIELD CORPORATION

CANFIELD, OHIO

HAZARDOUS WASTE I.D. NO. OHDO041897

Q.T, TSD, PAK

Gentlemen:

On August 15, 1980, we submitted to you our Notification of Hazardous Waste Activity for the referenced facility. The pre-assigned EPA I.D. No. was OHD004189775. We have subsequently used this number on all correspondence, applications and manifests.

We have, however, received three "Acknowledgements of Notification of Hazardous Waste Activity", the latest on June 17, 1982, using EPA I.D. No. OHD000810283. Neither reason nor potential impact of this confusion is apparent to us, and we request your assistance in resolving this matter.

We will continue to use OHD004189775 as the EPA I.D. Number for this plant until advised by your office to do otherwise.

Your assistance is appreciated.

Very truly yours,

W. R. Samples

Manager

Environmental Control

WRS/ng

INTER-OFFICE COMMUNICATION February 22, 198 Chris Frazier - DHMM - NEDO Pittsburg-Canfield Corp. (Wheeling-Pittsburg Steel) U.S. END #0110004189775 NGHD000810283 OEPA #02500336

ORIGINAL TO PA COPY to

The accompanying letter from Pittsburg-Canfield Corporation requests modification of their treatment permit. The request is a result of my February 10, 1982, reinspection. During the inspection, it became evident that the waste, for which the permit was issued, had been incorrectly identified.

The facility generates two separate waste streams - cyanide containing sodium carbonates and spent chromate solution. The sodium carbonates (F008) are waste by-products of their electrogal vanizing operation. This waste is shipped off-site within ninety (90) days, therefore, no storage permit has been issued.

After galvanization is complete, the steel is "sealed" with a chromate solution to prevent "white rust" formation. Eventually the chromate solution becomes spent and must be discarded.

Although the chromate solution comes from an operation separate from the electroplating operation, the disposal firm is concerned with the possible presence of cyanide in the The firm has refused to accept the waste unless it is first treated for cyanide. Pittsburg-Canfield claims cyanide is not present in the spent solution, but has agreed to treat the waste to pacify the disposal firm (they find it more economical to treat the waste than to change disposal firms - disposer services all Wheeling-Pittsburg plants).

The treatment process consists of:

- Addition of caustic to raise pH of the solution; and,
- Addition of chlorine gas until residual chlorine is present in solution. 2.

The treated solution is then shipped off-site immediately.

The spent chromate solution is listed as FOO7 and FOO8 on the Part A. Since chromium. and not cyanide is the hazardous constituent, it was suggested that DOO7 would more accurately identify the waste material.

If there are any questions, please call me at (216) 425-9171. Thank you for your attention to this matter. Part A AMENDMENT:

CMF: km

Enclosure

cc: P. Cotter, DHMM, C.O.

K. Homer, SIP, U.S. EPA - Region V

Change waste codes (per letter from OEPA & Companie from: FOOT and FOOS to

>007. (See Yerox page of

Part A)

FORM GEN 1001

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Duvall Center Wheeling, West Virginia 26003

February 11, 1982

Mrs. Chris Frazier OHIO ENVIRONMENTAL PROTECTION AGENCY Northeast District Office 2110 E. Aurora Road Twinsburg, Ohio 44087

Re: CANFIELD PLANT

EPA I.D. NO. OHD 004 189 775 OHD 000 8,10283

HAZARDOUS WASTE MANAGEMENT PERMIT APPLICATION

Dear Mrs. Frazier:

Mr. Tradler and I appreciated the opportunity to discuss the status of our hazardous waste activities at our Canfield Plant with you yesterday. The purpose of this letter is to followup on your suggestion that we modify our Hazardous Waste Management Permit Application.

We originally filed our Hazardous Waste Management Permit Application with the U. S. Environmental Protection Agency on November 19, 1980. A copy of that application was sent to your Columbus office on April 7, 1981. The application was for our treatment of a chromium-containing wastewater which we designated as F007.

After discussing this with you yesterday, I agree that it would be more appropriate to list the waste as D007. As you suggested, I have attached a corrected page 3 of 5 of our application showing this change. It would be appreciated if you would forward a copy of this modified page to your Columbus office to update their records.

The matters relating to inspections and contingency planning are being prepared and we will notify you as soon as they have been completed.

We thank you for the many suggestions and ideas which you shared with us yesterday. Please let us know if you need any further information.

Very truly yours,

W. R. Samples

Manager

Environmental Control

WRS/ng Attachment OHIO ENVIRONME PROTECTION AGE N. E. D. O.

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| II. POLLUTANT CHARACTERISTICS | 144 | | | | | |
| INSTRUCTIONS: Complete A through J to determine w | hether y | ou need to | submit any permit application | forms to the EPA. If you answ | ver "yes" | to any |
| questions, you must submit this form and the supplement if the supplemental form is attached. If you answer "no" | tal form | listed in the | e parenthesis following the que | stion. Mark "X" in the box in t | he third | column |
| is excluded from permit requirements; see Section C of the | | | | | | |
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| C. Is this a facility which currently results in discharges | 16 17 | 18 | D. Is this a proposed facility | (other than those described | 19 20 | |
| to waters of the U.S. other than those described in A or B above? (FORM 2C) | X 22 23 | 24 | in A or B above) which | will result in a discharge to M 2D) | 25 26 | |
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| hazardous wastes? (FORM 3) | х | х | taining, within one qua | rter mile of the well bore, rinking water? (FORM 4) | 2 | and the second |
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| oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4) | | | | overy of geothermal energy? | | |
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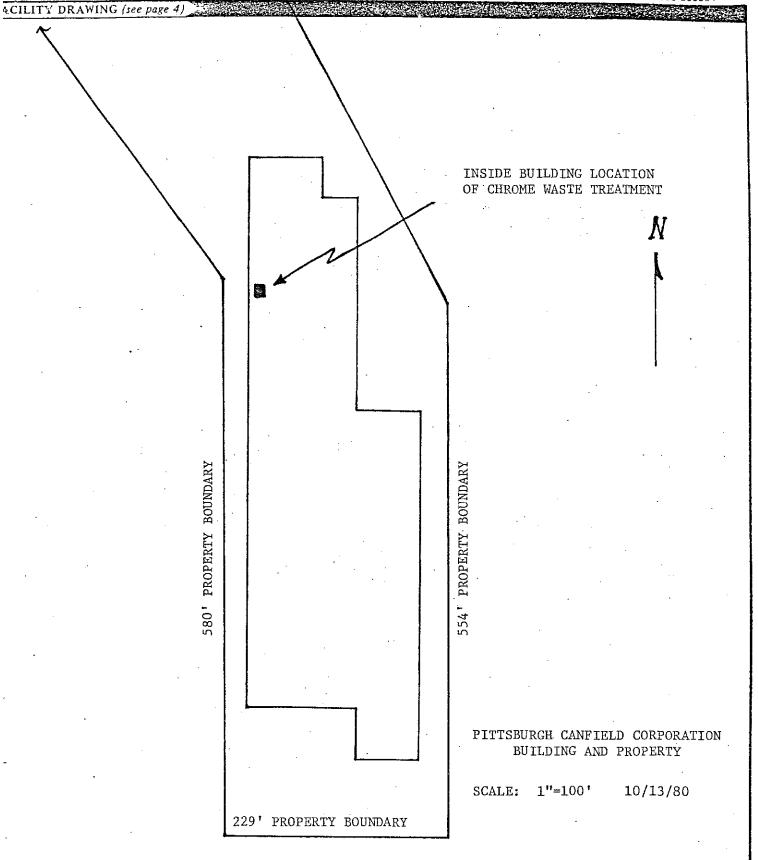
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| FACILITY DRAWING | | | Service Control | |
| If existing facilities must include in the space provided or | page 5 a scale draw | ring of the facility (see instruction | s for more detail). | |
| L. PHOTOGRAPHS | | | | |
| All existing facilities must include photographs (ael reatment and disposal areas; and sites of future sto | <i>rial or ground—lev</i> prage, treatment o | vel) that clearly delineate all e | existing structures; | existing storage, |
| II. FACILITY GEOGRAPHIC LOCATION | | | | /· |
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| III. FACILITY OWNER | | 72 | 72 75 76 77 | 72 |
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| skip to Section IX below. | nated in Section V | ii on i omi i, General informati | ion , place an X in | the box to the left and |
| B. If the facility owner is not the facility operator as | listed in Section VII | I on Form 1, complete the follow | wing items: | ration in the second |
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| 3. STREET OR P.O. BOX | | 4. CITY OR TOWN | 5.ST. | 6. ZIP CODE |
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| X. OWNER CERTIFICATION | | | 40 41 47 | 17 |
| certify under penalty of law that I have personally | examined and an | n familiar with the information | on submitted in th | s and all attached |
| ocuments, and that based on my inquiry of those i | individuals immed | liately responsible for obtaining | ng the information | . I believe that the |
| abmitted information is true, accurate, and comple accluding the possibility of fine and imprisonment. | ete. I am aware the | at there are significant penalt. | ies for submitting | false information, |
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| certify under penalty of law that I have personally | examined and an | n familiar with the information | on submitted in the | s and all attached |
| ocuments, and that based on my inquiry of those in Indicated information is true, accurate, and comple | naiviauals immed ete. I am aware the | vately responsible for obtaining at there are significant penalt. | ng the information ies for submitting | , I believe that the |
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| A Form 3510-3 (6-80) | BACE | | | CONTINUE ON PAGE 5 |

Revisions shown in purple compiled in cooperation with State of Ohio agencies from aerial photographs taken 1970 This information not field checked N4100---W8045/7.5

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CHROMIC TREATMENT PITTSBURGH-CANFIELD CORP. OCTOBER 10, 1980

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STEEL CORPORATION

Duvall Center Wheeling, West Virginia 26003

November 19, 1980

Environmental Protection Agency Region V RCRA Activities P. O. Box 7861 Chicago, Illinois 60680

Re: CANFIELD PLANT

HAZARDOUS WASTE MANAGEMENT PERMIT APPLICATION EPA I.D. NO. 9HD004189775 OHD0008 10283

Gentlemen:

Attached is our completed application for a Hazardous Waste Permit for our Canfield Plant. We have carefully reviewed our activities in your region and believe that this facility is the only one which requires a permit.

If you have any questions or require further information, please let me know.

Very truly yours,

W. R. Samples

Manager

Environmental Control

31. R. Sayle

WRS/ng Attachment

THE STATE OF THE S

J. V. DAY, VICE PRESIDENT ENVIRONMENTAL AFFAIRS



January 14, 1983

Mr. Valdas V. Adamkus, Regional Administrator U.S. Environmental Protection Agency - Region V 230 S. Dearborn Chicago, IL 60604

Dear Mr. Adamkus:

RE: Standards Applicable to Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities; Liability Requirements

The attached Certificate of Liability Insurance provides coverage for non-sudden accidental occurrences at our facility in Toledo, Ohio.

The certificate is submitted in accordance with requirements in Subpart H, Part 265.147(b) of the Resource Conservation and Recovery Act.

Very truly yours,

Jeptha V. Day, Vice President Corporate Environmental Affairs

JVD/ra Attch. Adamkus/INS 1. INDUSTRIAL INDEMNITY COMPANY, the "Insurer", of 255 California Street, San Francisco, Ca. 94120 hereby certifies that it has issued liability insurance covering bodily injury and property damage to KAISER ALUMINUM & CHEMICAL CORPORATION and all it's wholly owned subsidiaries, the "Insured", of 300 Lakeside Drive, Oakland, Ca. 94643 in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at:

Ravenswood Works
EPA ID# WVD 009233297
PO Box 98
State Route 20
Ravenswood, WV 26164

Toledo Works
EPA ID# OHD 042159285
5201 Enterprise Blvd.
Toledo, OH 43601

Mead Works
EPA ID# WAD 0000 65508
PO BOX 6217
Hawthorne Road
Spokane, WA 99207

Trentwood Works
EPA ID# WAD 009067281
PO Box 15108
Spokane,WA 99215

Tacoma Works
EPA ID# WAD 001882984
3400 Taylor Way
Tacoma, WA 98421

Regional Administrator U.S. EPA - Region III 6th & Walnut Streets Philadelphia, PA 19106

Regional Administrator U.S. EPA - Region V 230 S. Dearborn Chicago, IL 60604

Regional Administrator U.S. EFA - Region X 1200 6th Avenue Seattle, WA 98101

Regional Administrator U.S. EPA - Region X 1200 6th Avenue Seattle, WA 98101

Regional Administrator U.S. EPA - Region X 1200 6th Avenue Seattle, WA 78101

for "non-sudden occurrences". The limits of liability are \$3,000,000 each occurrence and \$6,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number IL 8095942, issued on 6/17/82. The effective date of said policy is 4/1/82.

- 2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

- (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrators of the EFA Regions in which the facilities are located.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Signature of authorized representative of Insurer

WULLEM FAT William H. Wetherall

Manager, Insurance Management Services

Industrial Underwriters, Inc.

201 California Street, Suite 1000

San Francisco, California 94111

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Chris T. 7



Duvall Center
Wheeling, West Virginia 26003

August 10, 1982



AUG 18 1982

Regional Administrator
U. S. Environmental Protection Agency
Region V
Ill West Jackson Blvd.
Chicago, ILL 60604

Re: PITTSBURGH-CANFIELD CORPORATION

EPA I.D. NO. OHD 000810283

HAZARDOUS WASTES, FINANCIAL REQUIREMENTS

Dear Sir:

Attached are support documents required by Part 264 of your Regulations for Owners and Operators of Permitted Waste Facilities. Included are Certificates of Insurance for "Financial Assurance of Closure", required by Regulation 264.143, and for "Liability Requirements" relative to sudden accidental occurrences specified by Regulation 264.147.

Subsequent to our requesting these certificates, we have been informed by your office to discontinue the use of EPA I.D. No. OHD 004189775 and begin using instead EPA I.D. No. OHD 000810283. Therefore, all future correspondence regarding hazardous waste activities for the Pittsburgh-Canfield Plant will specify the latter identification number.

Very truly yours,

W. R. Samples

Manager

Environmental Control

WRS/ng Attachments

CERTIFICATE OF INSURANCE FOR CLOSURE

Name and Address of Insured:

Pittsburgh Canfield Corporation Subsidiary of Wheeling-Pittsburgh Steel 460 West Main Street Canfield, Ohio 44406

Name and Address of Insurer:

Associated Indemnity Corporation Two Chatham Center, Suite 300 P. O. Box 888 Pittsburgh, Pennsylvania 15230

Facility Covered:

Canfield, Ohio

Amount of Insurance for Closure:

\$4,000

EPA Identification Number:

OHD004189775

Face Amount:

\$4,000

Policy Number:

KLA 321 41 01

Effective Date:

January 1, 1982-83

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for the closure for the facility identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e), 265.143(d), and 265.145(d), as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

Whenever requested by the EPA Regional Administrator(s) of the U.S. Environmental Protection Agency, the Insurer agrees to furnish to the EPA Regional Administrator(s) a duplicate original of the policy listed above, including all endorsements thereon.

I hereby certify that the wording of this certificate is identical to the wording specified in 40 CFR 264.151(e) as such regulations were constituted on the date shown immediately below.

Robert P. Miller

Assistant Vice President

Polar P. Miller

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

Associated Indemnity Corporation, Two Chatham Center, Suite 300, P. 0. Box 888, Pittsburgh, Pennsylvania, 15230 hereby certifies that it has issued liability insurance covering Bodily Injury and Property Damage to Pittsburgh Canfield Corporation, Subsidiary of Wheeling~Pittsburgh Steel, 460 West Main Street, Canfield, Ohio, 44406, in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA I.D. No. - OHD004189775, Canfield, Ohio for "sudden accidental occurrences".

The Limits of Liability are \$1,000,000 Each Occurrence and \$2,000,000 Annual Aggregate exclusive of legal defense costs. The coverage is provided under policy number KLA 321 41 01, issued on January 29, 1982. The effective date of said policy is January 1, 1982 - 83.

Pros P. Miller

Robert P. Miller Assistant Vice President Alexander & Alexander Inc. 1200 Porter Building Pittsburgh, Pennsylvania 15219

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STEEL CORPORATION

Duvall Center Wheeling, West Virginia 26003

July 2, 1982

Environmental Protection Agency Region V RCRA Activities P. O. Box 7861 Chicago, Ill 60680

040 000 810 283

Re: CANFIELD PLANT

PITTSBURGH-CANFIELD CORPORATION

EPA I.D. NO. OHD 004189775 - HAZARDOUS WASTE RCRA 264.143, FINANCIAL ASSURANCE OF CLOSURE

Gentlemen:

No such number

It has just come to my attention that Wheeling-Pittsburgh Steel has an obligation to establish financial assurance for closure of our hazardous waste treatment facilities, Unfortunately, this obligation was not recognized in time for us to obtain and submit to you the necessary financial documentation by the deadline, which I understand is July 6, 1982. Because of this oversight, I respectfully request that you accept my apology and the promise to submit the required documentation as soon as it can be obtained.

The only facility which we operate in your region that we believe is covered by Regulation 264.143, Financial Assurance of Closure, is a small batch treatment unit at the Canfield Plant of our subsidiary, Pittsburgh-Canfield Corporation. The estimated cost of closure of this facility is only about \$3,000.

Your patience and understanding are appreciated. Please call me if you have any questions or if there are any problems. My telephone number is (304) 234-2936.

Very truly yours,

2h.R. Sompe

W. R. Samples

Manager

Environmental Control

WRS/ng

Re: Pittsburgh-Canfield Corporation -

Mahoning County

#02-50-0336 OHD 440-189-775

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DIV. HAZARDOUS MATERIALS MANAGEMENT

March 6, 1984

Mr. Marvin Tradler
Pittsburgh-Canfield Corporation
460 W. Main Street
P.O. Box 556
Canfield, Ohio 44406

Dear Mr. Tradler:

This letter will follow-up my February 15, 1984, inspection of the Pittsburgh-Canfield Corporation. You and Bill Samples represented the facility during the inspection.

A copy of the inspection report is enclosed for your information. The following violations were observed:

- 1. Any containers used to temporarily store the chromate solution ——were not included in the inspection program as required by OAC ——3745-66-74;
- 2. Shovels, pumps and absorbant material used for spill clean-up was not included in the Contingency Plan as required by OAC 3745-65-52; and,
- 3. Copies of the Contingency Plan had not been sent to all local emergency authorities as required by OAC 3745-65-53.

Please correct these problems within thirty (30) days of receipt of this letter. You should indicate, in writing, what actions were taken to attain compliance with the State of Ohio Hazardous Waste regulations.

If there are questions, please call me at (216) 425-9171. Thank you for your continued cooperation.

Yours truly,

Christine Mikoy Frazier

Environmental Scientist

Division of Hazardous Materials Management

CMF: km

Enclosure

cc: Paula Cotter, Division of Hazardous Materials Management, Central Office William Samples, Wheeling-Pittsburgh Steel Corporation

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Re: Pittsburgh-Canfield Corporation

#02-50-0336



WASTE MANAGEMENT BRANCH

March 8, 1983

Mr. Marvin Tradler
Pittsburgh-Canfield Corporation
460 W. Main Street
Canfield, Ohio 44406

OHO 0008 D 283

Dear Mr. Tradler:

Thank you for the courtesy extended during my February 4, 1983, inspection of the Pittsburgh-Canfield Corporation. This letter is intended to follow-up the inspection during which you acted as the company representative. The facility was inspected for compliance with the State and Federal hazardous waste regulations. A copy of the inspection report is enclosed for your information.

During the inspection, you indicated that the company discontinued treatment and long-term drum storage during the fall of 1982. You also indicated that notice of withdrawal from the permit system had been sent to the Ohio EPA. Notice of withdrawal should also be sent to the U.S. EPA. Your facility Closure Plan, as required by OAC 3745-66-12 and 40 CFR 265.112, should be sent to both agencies. These submissions should be directed to Mr. Tom Crepeau, Permits, Manifests, and Records Section, OEPA, Box 1049, Columbus, Ohio 43215 and Ms. Kathy Homer, U.S. EPA - Region V, 230 S. Dearborn Street, Chicago, Illinois 60604.

Upon approval of the Closure Plan, you will have 90 days to decontaminate and permanently close the treatment operation. Since the container storage area will continue to be used as temporary (< 90 days) storage, you should indicate why the drum storage permit is no longer necessary, which hazardous waste firm is handling disposal and the frequency of pick-up.

The following problems were noted during the inspection:

- portable container holding the chrome waste was not marked with the words "Hazardous Waste" or the beginning date of accumulation (OAC 3745-52-34 and 40 CFR 262.34);
- 2. annual personnel training refresher course had not been given (OAC 3745-65-16 and 40 CFR 265.16);
- 3. inadequate aisle space was left between drummed wastes (OAC 3745-65-35 and 40 CFR 265.35); and,
- 4. contingency plan did not include a listing of any emergency equipment including its location, physical description and description of its capabilities (OAC 3745-65-52 and 40 CFR 265.52).



Pittsburgh-Canfield Corporation

Page 2

March 8, 1983

Please correct these problems within thirty days of receipt of this letter. Your facility will be reinspected after thirty days to verify that compliance has been attained. Please call me at (216) 425-9171 if there are any questions.

This report will become part of the official records of the Ohio EPA. A copy of the report will also be forwarded to Ms. Kathy Homer, U.S. EPA - Region V, Chicago, Illinois.

Yours truly,

bustine Mikey Frazier Christine Mikoy Frazier Environmental Scientist

Division of Hazardous Materials Management

Northeast District Office

CMF: km

Enclosure

Paula Cotter, Division of Hazardous Materials Management, Central Office

Kathy Homer, U.S. EPA - Region V



Mr. Marvin Tradler Chief Engineer Pittsburg-Canfield Corporation 460 W. Main Street Canfield, Ohio 44406 February 12, 1982

Dear Mr. Tradler:

This letter is intended to serve as a follow-up to my February 10, 1982, inspection. The inspection focused on the proper characterization of your waste streams and compliance with applicable generator and/or treatment regulations.

According to our discussion, the Pittsburg-Canfield plant produces two hazardous waste streams - cyanide bearing sodium carbonate (F007 or F008) and spent chromate solution (D007). The sodium carbonates are generated and shipped off-site within ninety (90) days. A storage permit is not required for this waste.

The spent chromate solution is generated and treated with chlorine to maintain the acidic nature of the waste. The treated waste is then pumped directly to a Pittsburg-Canfield tank truck for immediate shipment off-site. A treatment permit has been issued for this waste stream.

The spent chromate solution has been designated as F007/F008 on the Part A application. An F007 or F008 waste is designated as such because of its cyanide content. Since chromium, and not cyanide, is the concern associated with your waste stream, we agreed to change the waste identification to D007. We look forward to receipt of a new Part A form which has been revised to reflect the correct waste identification.

Enclosed in this letter is a copy of the inspection form as it pertains to your facility. In general, the facility was noted to be in substantial compliance with most of the regulations. However, some violations were noted during the inspection. They include:

- 1. lack of inspection plan and record of inspections although inspections are carried out on a daily basis, a written inspection plan and written record of inspection, as per 3745-54-15 (B), (D) and 3745-56-74, was not available for review;
- 2. failure to register with P.U.C.O. as per 3745-53-11;

Re: Pittsburg-Canfield rp.
Mr. Marvin Tradler
Page Two

- 3. lack of contingency plan although emergency procedures and arrangement have been developed, a written plan specifying emergency procedures, emergency coordinators, arrangements with local authorities, evacuation plan and listing of emergency equipment, as per 3745-54-51, 52, was not available for review; and,
- 4. lack of waste analysis plan as per 3745-54-13 (B).

The above named violations should be corrected within sixty (60) days of receipt of this letter. Please send a copy of the inspection, waste analysis and contingency plans along with a letter certifying whether application has been made to the P.U.C.O. for transporter registration.

Thank you again for the hospitality shown during my visit. If you have any questions, please do not hesitate to call.

Yours truly,

Christine Mikoy Frazier

Environmental Scientist

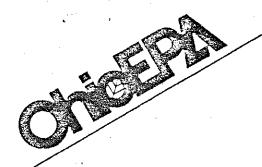
Division of Hazardous Materials Management

CMF: km

Enclosure

cc: Paula Cotter, DHMM, C.O.
Peggy Vince, HWFAB, C.O.

Kathy Homer, SIP, U.S. EPA - Region V



Re: Application Number 81-HW-0336

Mahoning County

August 28, 1981

RECEIVED

AUG 31 1981

WASTE WANAGEMENT BRANCH
EPA, REGION V

William Samples Environmental Control Pittsburgh Canfield Corporation 1134 Market Street Wheeling, W.V. 26003

Dear Mr. Samples:

On July 24, 1981, Jeff Harris of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by Marvin Tradler.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan, P.E.

Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V

Jeff Harris, NEDO

CERTIFIED MAIL

INSPECTOR(S)

| | (Name) | (Telephone) |
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| _: | Type(s) of hazardous waste site activity: A. $\frac{Ecc.7}{kor7}$ Generation B. Sto | Storage C. $0\alpha T$ Treatmen |
| • | D. poor / Transportation E. | Disposal |
| S. | Specific hazardous wastes handled at this facility (EPA HW#): | |
| | a) Listed Wastes: FOOT or FOO - ayande Raing sodium | aubonates your |
| | electrocalizance solution | |
| | | |
| | b) Non-Listed Wastes: I C R T T D0002 D0003 D0000 | |
| | 1 - soint chamate waster | sting solution |
| | | |
| . ~ | Has this facility submitted a Part A Permit Application? Ves No | |

Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

Yes, See Remark #

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PART 2.

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| | Remark # | no analysis | -knowledge | | | | | |
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| | Yes | | | | | A | | > |
| TO CENEBATOR RECUITREMENTS / | uspeated handling of FootFood waste (containers) and | The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11. | Does this facility generate any hazardous wastes that are excluded from regula- tion under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)? | Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10. | The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest: | a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22. | b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20. | c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23. |

Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.

The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.

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| store, treat or dispose of any hazardous waste from any foreign sources? | | No |
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| this facility | ٠ | |
| Does | | |
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- Does this facility transport hazardous waste materials off-site for itself or other generators? V Yes, Complete Part 3 (Transp.)
- a) Applicable U.S. EPA I.D. Number OHOCOHISGITAS
- b) Ohio P.U.C.O. GR TRSF Number That int oftened
- 7. A brief description of site activity:

Now Transportation off-site. Before treatment, the west is temporarily (410 days) sould in a holding tremph , Hobbit INFORMATIONS encated. sodium earborited (from electrogaloaning process) and spine chomitic white (from ehromite solition). The solid sodium earborates an dumining and shoped off-solit within a day. The chomate waste is triated with elevine to maintain and then sounded our the survey of the short to their bulk tank then bulk took trials. Are plant strotiogolognizard & works steel wills. Aley grandle eyanide bearing

- The date that accumulation began is clearly marked on each container. $\widehat{\Delta}$
- The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54). \widehat{c}
- Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56). and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met. T
- Tanks: the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D. (e)
- equipped with a spill containment system with a capacity that equals or ex-Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are ceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C). 4
- Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C). 6
- Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E). 2
- The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).
- 3745_55-16-D-E including written job titles, job descriptions and documented The generator keeps all of the records required by Sections 265.16(d)(e) and employee training records (Sections 262.34 and 3745-52-34) 10.

Yes No N/A Remark #
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Remark

N/A

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Yes

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- Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A). (B)
- with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-Prior to offering hazardous wastes for transport off-site each container 52-32-B. q
- The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33. Û
- generator meets the following recordkeeping and reporting requirements: The ပ္
- The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B. æ
- treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, The generator has submitted an annual report for all hazardous waste when applicable. $\widehat{\mathbf{q}}$
- Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.
- tanks for 90 days or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to If the generator elects to store hazardous waste on-site in containers or such storage are met: ထ
- applicable DOT pre-transport requirements for packaging, labeling and the waste is stored in closed containers which meet all Containers: a)

Ecch only

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Remark

N/A

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Yes

PART 3. TRANSPORTER REQUIREMENTS

- The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).
- The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52. v.
- The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.
- facility, the transporter has signed the manifest as required in Section 263.20 (d) and 3745-53-20-D and has retained a signed copy (available for inspection) Upon delivery of the hazardous waste to the next transporter or the designated for at least 3 years (263.22(a) and 3745-53-22-A).
- this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21). The transporter has delivered the entire quantity of hazardous waste accepted rom the generator in accordance with manifest instructions; in cases where ഹ
- If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F. Ġ
- If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).
- Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control? ထံ
- Was immediate action taken? (Notify authorities, dike discharge) (263.30 (a) and 3745-53-30-A). a)

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No N/A Remark

whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.

Yes No N/

SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS. NOTE:

REMARKS, PART 2. GENERATOR REQUIREMENTS

GENERAL INTERIM STATUS REQUIREMENTS PART 4.

SUBPARTS INCLUDED

| | ards Yes No N/A Remark # aste mate- | -13-A-2. \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ | tions 265. | erial, the f the fa- ons 265.14 | - Andrian Continue | portion | Taclilty | to the $\sqrt{}$ |
|--|--|--|--|---|--------------------|---------|--|---|
| Preparedness and Prevention F: Ground Water Monitoring Contingency G: Closure | Subpart B: General Facility Standards Doors waste. The operator has a detailed chemical and physical analysis of the waste | rial containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2. The operator has a written waste analysis plan which describes analytical pa- | rameters, test methods, sampiling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265) and 3745-55-13-B). | If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14). | | | c) Controlled entry (gates, monitors) to the active portion of the facility at all times $(265.14(2)(ii))$ and $3745-55-14-B-2-b)$. | d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and $3745-55-14-C$). |

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| | | Yes No | | N/A | Remark # |
|---|--|---|---|-----|--|
| : | b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made? | | | 1 | Management of the second of th |
| | c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31? | | | 71 | |
| 0 | 9. Does the transporter store hazardous wastes temporarily while they are in transit? | *************************************** | K | 1 | |
| | a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12) | | · | | * |
| | | | | | |

STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION. TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH NOTE:

- Does the transporter import hazardous waste into the United States? 0:
- Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container? ---------

A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52. NOTE:

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

Remark

N/A

2

Yes

- a) Protection from sources of ignition.
- b) Physical separation of incompatible waste materials.
- Flames" signs near areas where Ignitable or Reac-"No Smoking" or "No Open tive wastes are handled. G
- Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-8. Q

Subpart C: Preparedness and Prevention

- Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).
- If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32). <;
- Internal alarm system
- telephone, radio or other device for summoning emergency assis-ಭ Access <u>a</u>
- c) Portable fire control equipment.
- adequate volume and pressure via hoses sprinklers, foamers or Water at sprayers. (
- All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33). as necessary; testing and maintenance are documented. ~
- sonnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-If required due to the actual hazards associated with the waste material, per-

Remark

N/A

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Yes

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| | | | |
| nust develop and follow a comprehensive, written inspection plan | nent the inspections, malfunctions and any remedial actions taken | ig record log which is kept for at least three years. The plan | following elements: (Sections 265.15 and 3745-55-15) |
| elop and follo | inspections, | d log which is | g elements: (|
| he operator must dev | nd must document the | n an operating recor | ncludes the followin |
| | 10 | | • |

- a) Inspect emergency equipment.
- b) Inspect monitoring equipment.
- c) Inspect security, alarm and communications devices.
- d) Inspect process equipment (pipes, pumps, etc.).
- e) Inspect containment structures (dikes, curbs, etc.).
- Inspect facility for structural malfunctions (roof, floor, etc.). 4
- Inspect hazardous waste handling/loading areas each day used, g)
- Record of any malfunctions due to equipment or operator errors. $\overline{\Xi}$
- Record of any hazardous waste discharges.
- The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within months and providing an annual training program refresher course. S.
- The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee trainrecords. တ်
- If required due to the actual hazards associated with Ignitable, Reactive or in-(Seccompatible waste materials, the facility meets the following requirements tions 265.17 and 3745-55-17).

Remark

N/A

Yes

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|---|------------------------------------|--------------------|
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| | or | |
| | changes | |
| | personnel | |
| | and | |
| - | equipment and personnel changes or | |
| | to facility, | 3745-55-54). |
| | evised in response to facility, | (265.54 and |
| | e plan is revised | ailure of the plan |
| | 3. The | fa |

- has familiar with all aspects of site operation and emergency procedures and the authority to implement all aspects of the Contingency Plan (Sections 5s and 3745-55-55). An emergency coordinator is designated at all times (on-site or on-call) 4
- If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56. rC)

Subpart E: Manifests/Records/Reporting

THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES NOTE:

| 2 | |
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| res | |
| | The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information: |
| | -6 |

=1:

Remark

N/A

- Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1)) and 3745-55-73-B-1). ന
- Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s). a

The estimated (or actual) weight, volume or density of the waste mate-

Û

A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, G

Remark

N

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Yes

- adequate aisle space to allow unobstructed movement or emergency or spill If required due to the actual hazards associated with the waste material control equipment is maintained (265.35 and 3745-55-35). . Ω
- facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the fa-If required due to the actual hazards associated with the waste material, the cility layout (265.37(a) and 3745-55-37-A). . ف
- Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).

Subpart D: Contingency and Emergency

- The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:
- Actions to be taken by personnel in the event of an emergency incident. a)
- Arrangements or agreements with local or state emergency authorities a
- Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. \hat{c}
- A list of all emergency equipment including location, physical description and outline of capabilities. ê
- If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-(e)
- A copy of the Contingency Plan and any plan revisions is maintained on-site and (Sections 265. has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. 53 and 3745-55-53). å

doguments

Remark

N/A

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Yes

| , etc.) | | | |
|--|---|---|----------------|
| (bulk shipments, | | -22-/ -5/ | |
| shinning papers are used in lieu of manifests (bulk shipments, etc | | +he came requirements are met (765.//(b) and 3/45-55-//-6). | |
| 's are used in | | nonts are met | |
| a) If chinning maner | | the came neonitrem | こうこうごう シニュウンニン |
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- 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2). Any significant discrepancies in the manifest, as defined in Sections q
- Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director. ഹ
- posal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/ sources (except from small quantity generators) for treatment, storage or dis-If the facility has accepted any unmanifested hazardous wastes from off-site Director within 15 days. ပ္

Subpart F: Groundwater Monitoring

THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

Remark

N/A

2

Yes

The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:

A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94. a

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Remark

N/A

Yes / No

|) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste | recorded on a map of the facility and cross-references to any pertinent | manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2). |
|--|---|--|
| £ | | |

- Records of any waste analyses and trial tests required to be performed. 9
- Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements Subpart B). 2
- Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6. سا.
- Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.
- The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75. v.

THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41. NOTE:

When applicable, the perator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).

THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES. NOTE:

Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).

RCRA INTERIM STATUS INSPECTION FORM

Remark

N/A

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Yes

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|---|--|--|
| | ÷ | 1 |
| 1 | ninistrator/Director 180 | |
| | to the Regional Ad | process. |
| | The Closure Plan has been submitted to the Regional Administrator/Director 180 | days prior to beginning the Closure process. |
| | က | |

- If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02. 4
- The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04. a)
- contaminated and any hazardous residues were properly disposed of (265.114 Upon completion of Closure all facility equipment and structures were deand 3745-56-05). <u>a</u>
- Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06). $\widehat{\mathbf{c}}$

THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES. NOTE:

- A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A. ъ.
- The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation. ယ်
- The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.
- The Owner/Operator has submitted all of the information on prior use of the the Local Land Auproperty required in Sections 265.119 and 3745-56-10 to thority within 90 days after Closure is completed. ထ

| . t. | | | | | | Yes | 9 | N/A | N/A Remark # |
|------|---|-------------------------|--|--------------------------|--|-----|---|-----|--------------|
| St | b) A waiver of all or part of the Green obtained by demonstrating a low possible. | oundwater otential f | the Groundwater Monitoring requirements has low potential for the migration of hazardous | requiremen ation of h | the Groundwater Monitoring requirements has been a low potential for the migration of hazardous | | | | |
| ξĔ | wastes and constituents in accorda | ance with | accordance with the requirements of Sections | ements of S | Sections | | | ` | |
| ~~/ | 265.90(c) and 3745-55-91-C. | | | | | | | > | |

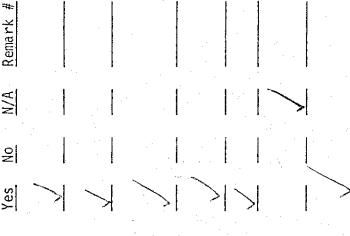
Plan that was first submitted to the Regional Administrator/Director was implemented and is operated 265.90(d) and 3745-55-90-D. An alternate Groundwater Monitoring System and maintained in accordance with Sections $\hat{\sigma}$

Subpart G: Closure and Post-Closure

THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES: NOTE:

| N/A | |
|-----|---|
| 2 | |
| res | 7 |
| | 1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265,112 and 3745-56-03) |
| | |

- A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1) (e
- A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.
- An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. ၁
- A description of steps taken to decontaminate facility equipment. þ
- The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed. e G
- The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. ċ



RCRA INTERIM STATUS INSPECTION FORM

TREATMENT/STORAGE/DISPOSAL PART 5.

SUBPARTS INCLUDED

| T. Managomost of Containor | i Macto Dilac | O・ Troingratore |
|-----------------------------|---------------------|---|
| in management of containing | ביים אמטינים - ויים | |
| 1: Management of Tanks | M: Land Treatment | P: Thermal Treatment |
| | | O. Chemian 1 Obucian 10:01alation Transtu |
| K: Surface Impoundments | N: Langle Is | d: chemical/rhysical/biological meanieme |

Management of Containers Subpart I:

Remark

N/A

의

Yes

| | ~- | | |
|--|--|---|--|
| | | 1 | |
| | | , | ٠ |
| tes are stored in closed containers which are in good physical | are compatible with the wastes stored in them (Sections 265. | | The second secon |
| Hazardous wastes are stored in closed | condition and are compatible with the | 171, .172, .173 and 3745-56-51,-52-53). | |
| e | | | c |

The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).

UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52) FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS NOTE:

Remark#

N/A

Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B). Yes No N/A Remark#

strument which will notify any potential purchaser that the property has been The property owner has attached a notation to the property deed or other inused to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10. ٠. ت

Subpart H: Financial Requirements

A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).

REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

Remark

| N/A | | 7 |
|--------|---|---|
| | | |
| 윈 | | |
| Yes No | | • |
| | | |
| | With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the opera- | tion by one or both of the following methods, (Sections 265.198(a) and 3745-56-78). |
| | 3 3 | th (C |

ဖဲ

- in compliance with the safety requirements of Sections 265.17(b) and 3745the tank is done treatment placed in The waste is treated immediately before or after being so that it is no longer Ignitable or Reactive and such
- The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction. 9
- Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).
- taminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79). Incompatible waste materials are not placed in the same tanks or put in con-ထံ
- Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77). တ်

Subpart K: Surface Impoundments

- freeboard and has a g ructural containment system adequate to contain the waste material (Sections $2\tau_0$.222 and 3745-57-03). The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of
- Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04). ć

Remark

N/A

일

Yes

Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265,177 (C) and 3745-56-57-C). Ŋ

Subpart J: Storage in Tanks

- The tank(s)-are operated in compliance with the safety requirements of Sections 265.17, (265.192(b)) 3745-55-17 and 3745-56-72-B and are equipped with a wastefeet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-
- equipped with a spill containment system with a capacity that equals or ex-Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are ceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C)
- discharge and cutoff, monitoring equipment, tank level and freeboard Daily inspections are made of all systems pertinent to the proper operation of (265.194 and 3745-56-74). "
- Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74). 4

tanko

- Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A). ຄ
- A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on in the facility operating record. a)
- Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record. 9

tanka ungetek but

5-2

- the facility has implemented a groundwater monitoring program capable of determining the impact of the Surface Impoundment(s) on the quality of the groundwater As required by Subpart F, Sections 265.90 and 3745-55-90 (Groundwater Monitoring, in the uppermost aquifer underlying the facility. ထ
- In lieu of a groundwater monitoring program, the operator has a written demonstration that there is a low potential for migration of hazardous waste or constration stituents via ground or surface waters which has been certified in writing by qualified geologist in compliance with Sections 265.90(c) and 3745-55-90-C. ď
- 265.228 and 3745-57-09 in order to exempt the Surface Impoundment from fur-Upon closure of the Surface Impoundment, the operator intends to remove all wastes, residues, liners and any contaminated soil as required by Sections ther regulation under Section 265. Ö

REQUIREMENTS SPECIFIED IN SUBPART G FOR DISPOSAL FACILITIES AND SUBPART N, SECTION 265.310 FOR LANDFILLS. IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUNDWATER MONITORING (SECTIONS 265.228 AND 3745-57-09) NOTE:

Remark

N/A

읟

Yes

- Has the facility ever recorded an unplanned release of hazardous waste from the Surface Impoundment(s)? (Sections 265.15 and 3745-55-15). 4
- Whenever Surface Impoundments are used to treat or store wastes substantially different from previous wastes or when substantially different treatment prosafety of such changes by one or both of the following methods (265.225 and cesses are used in the Surface Impoundment, the facility has insured the 3745-57-06) က်
- prior to implementing the proposed changes and all data is on file in the A complete waste analysis plus bench scale or pilot tests were conducted facility operating record (a)
- Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record. 9
- With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in Surface Impoundments the facility has insured the safety of the operation by the following method (Sections 265.229 and 3745-57-10). ė
- The waste is treated immediately after placement in the Surface Impoundment so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.
- Incompatible materials are never placed in the same Surface Impoundment unless it is done in compliance with the safety requirements of Section 265.17(b) (Sections 265.230 and 3745-57-11).

RCRA INTERIM STATUS INSPECTION FORM

Remark

N/A

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Yes

| fill? |
|--|
| of the fil |
| Collection of run-off from active portions c |
| active |
| from |
| run-off |
| 40 |
|]]ection |
| b) (c |
| |

- c) Is collected run off treated?
- d) Control of wind dispersal of hazardous waste?
- Does the operating record include: Surveying and Recordkeeping. સં
- A map showing the exact location and dimensions of each cell? a)
- The contents of each cell and the location of each hazardous waste type within each cell? â
- 3. Closure and Post-Closure
- Is the Closure Plan available for inspection by May 19, 1981? a)
- b) Has this plan been submitted to the Regional Administrator?
- c) Has Closure begun?
- d) Is Closure cost estimate available by May 19, 1981?
- 4. Special requirements for ignitable or reactive waste
- Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive? a)

IF NOT, THE PROVISIONS IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE SEE TREATMENT REQUIREMENTS . OF 40 CFR 265.17(b) APPLY. NOTE:

| Wastes. |
|-------------|
| ø |
| Incompatibl |
| for |
| equirements |
| Req |
| Special F |
| () Sp |

Does the owner or operator dispose of incompatible wastes in separate If not, the provisions of 40 CFR 265.17(b) apply cells? a)

Subpart N: Landfills

1. General Operating Requirements. Does the facility provide the following:

NOTE: la, lb AND lc ARE EFFECTIVE ON NOVEMBER 19, 1981.

a) Diversion of run-on away from active portions of the fill?

2-7

Remark

N/A

위

Yes

| 1981) |
|---|
| requirements for liquid waste (effective November 19, 1981) |
| (effective |
| liquid waste |
| for |
| il requirements |
| Special |
| 9 |

- Are bulk or non-containerized liquids placed in the landfill?
- Does the landfill have a chemically and physically resistant liner system? $\widehat{\Delta}$
- Does the landfill have a functional leachate collection system? G
- Are free liquids stabilized prior to or immediately after placement in the landfill? Ŧ
- 7. Special requirements for Containers (effective November 19, 1981)
- Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?

| • | • | | * . |
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TREATMENT, STORAGE, AND DISPOSAL FACILITIES Form A. - General Facility Standards

I. General Information:

| (A) | Facility Name: Pittsburgh-Campield Corporation |
|------------|--|
| | Street: 460 West Main Street |
| (C) | City: (mileld (D) State: @ him (E) Zip Code: 4/406</td |
| (F) | Phone: 216.533-3311 (G) County: Malaning |
| | Operator:Same as above |
| (I·) | Street: |
| (J) | City: (K) State: (L) Zip Code |
| (M) | Phone: (N) County: |
| (0) (P) | Owner: Wheeling-Pittsburgh Stack Corporation Street: Deval Center |
| (Q) | City: Weeling (R) State: West Virginia (S) Zip Code: 26005 Phone: 304-234-2936 (U) County: Ohio |
| | Date of Inspection: 7/24 (W) Time of Inspection (From) 9:20 (To) 11:30 |
| (X) | Weather Conditions: 70°F, Clean |

| • | | | |
|------------|--|----------------------------------|------------------------------|
| (Y) | Person(s) Interviewec | Title | Telephone |
| | Bill Samples | Maragu Emviunmental Control | 304-234-2936 |
| | Bill Samples Marrin Fradler | Chief Emgineer | 216-533-331 |
| (Z) | Inspection Participants | Agency/Title | Telephone |
| | | | |
| · | | | |
| (AA) | Preparer Information | · | |
| | Name Auff M. Charics | Agency/Title | Telephone 216.405-9171 |
| | (100 | Regional Constinutor | |
| | Complete sections I through VII for a facilities. Complete the forms (in p to the site activities identified bel | arenthesis) in section VIII | or disposal corresponding |
| | | | |
| <u>/</u> A | . Storage and/or Treatment 1. Containers (I) 2 Tanks (J) | D. Incineration and/or (O and P) | Thermal Treatment |
| | 3. Surface Impoundments (K) 4. Waste Piles (L) | | and Biological |
| B | . Land Treatment (M) | N/A non-conver | sation with |
| c | . Landfills (N) | Marvin F | sation with adler 8-25-81 |

 $\underline{\underline{\text{Note:}}}$ If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

NA: Not Applicable

III. GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

| | | | Yes | No | NI* | Remark |
|-----|-----------|--|----------|----|---------------|--|
| (A) | | s the Regional Administrator en notified regarding: | | | | |
| | 1. | Receipt of hazardous waste from a foreign source? | | | | NA. No waste received from |
| | 2. | Facility expansion? | - | _ | | No brility expansion this |
| (B) | Gen | neral Waste Analysis: | | | ٠ | The state of the s |
| | 1. | Has the owner or operator obtained a detailed chemical and physical analysis of the waste? | i | | | |
| : | 2. | Does the owner or operator have a detailed waste analysis plan on file at the facility? | <u> </u> | | | |
| | 3. | Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? | <u>~</u> | | | |
| C) | Sec | urity - Do security measures includ (if applicable) | e: | | | |
| | 1. | 24-Hour surveillance? | <u>v</u> | | | 3 shifts at plant, sensing deriver |
| | 2. | Artificial or natural barrier around facility? | <u>v</u> | | - | Enclosed within a room inside de be |
| | 3. | Controlled entry? | V | | _ | Coucheal rolling door / treatment. |
| | 4. | Danger sign(s) at entrance? | ~ | - | | 1 16 a Attituche |
| D) | Do (| Owner or Operator Inspections Iude: | • | | | |
| | 1. | Records of malfunctions? | <u> </u> | | | No incidents to date. |
| | 2. | Records of operator error? | V | | | ti a is a |
| | 3. | Records of discharges? | V | | • | 1 1 11 |
| | | · | | | | · · · · · · · · · · · · · · · · · · · |

III GENERAL FACILITY STANDARDS - ntinued

| • | • | | Yes No | NI* | Remarks |
|-----|------|--|----------|-----------------|---|
| • | | * | , | •,• | |
| | 4. | Inspection schedule? | 1/- | | Daily inspections are conduc. I |
| | 5. | Safety, emergency equipment? | / | | air pochs, eye wosh, shows, gas ma |
| ٠ | 6. | Security devices? | <u> </u> | | find estingulation, sprinkling myster |
| | 7. | Operating and structural devices? | V | Gr-Griss | Spill control barrier |
| | 8. | Inspection log? | <u></u> | . April dan dan | Utiline maintenance notices |
| (E) | | personnel training records lude: (Effective 5/19/81) | | | as inspection logs. Filedonly when a problem urises. This explicition is a series of triplichers. |
| | 1. | Job titles? | | *** | |
| | 2. | Job descriptions? | <u></u> | | |
| | 3. | Description of training? | | | Fitensia training manu |
| | 4. | Records of training? | 0 | *** | |
| - | 5. | Have facility personnel received required training by 5-19-81? | <u>ب</u> | *** | |
| | 6. | Do new personnel receive required training within six months? | <u> </u> | | |
| (F) | requ | required are the following special uirements for ignitable, reactive, or ompatible wastes addressed? | | | |
| | 1. | Special handling? | | | NA No waste in these copy |
| | 2. | No smoking signs? | | | NA IL IL IL |
| | 3. | Separation and protection from ignition sources? | | | NA |

IV. PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

| | · · · · · · · · · · · · · · · · · · · | | | a contract of the contract of |
|-----|---|-----------------|---------------|---|
| (A) | Maintenance and Operation of Facility: | Yes No NI | * Remarks | |
| • | Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? | | | |
| (B) | If required, does the facility have the following equipment: | ٠ | | |
| | 1. Internal communications or alarm systems? | <u> </u> | | *************************************** |
| | 2. Telephone or 2-way radios at the scene of operations? | <u>/_</u> | _ | |
| | 3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? | <u></u> | | |
| | , , | | | |
| | Indicate the volume of water and/or foa | m available for | fire control: | |
| | Indicate the volume of water and/or for | | 4 - 0 | Confield Fire |
| (c) | • | | 4 - 0 | Confield Fire |
| (c) | Unlimited worker available Testing and Maintenance of | | 4 - 0 | |
| (c) | Testing and Maintenance of Emergency Equipment: 1. Has the owner or operator established testing and maintenance procedures | | vailsble from | |
| (C) | Testing and Maintenance of Emergency Equipment: 1. Has the owner or operator established testing and maintenance procedures for emergency equipment? 2. Is emergency equipment maintained in operable | | vailsble from | |

| (E) | Is there adequate aisle | space |
|-----|-------------------------|-------|
| | for unobstructed movemo | nt? |

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

- (A) Does the Contingency Plan contain the following information:
- Yes No NI* Remarks
- 1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
- Contingency Plan has an emissione procedure but it is not identified.
- Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
- 3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

Letter on file at Fire Rept. of emergency people to contact.

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

all pertinent a peration manic are available and personnel he had training in equipments use.

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

| | | Yes No | NI* | Remarks |
|-----|--|-------------|----------|---|
| (B) | Are copies of the Contingency Plan available at site and local emergency organizations? | 20.F. | | Copies of plan are available at Jocal emergency organizations have copy of clan but are away materials handled and do have |
| (C) | Emergency Coordinator | | | plant map. |
| | Is the facility Emergency Coordinator identified? | | | |
| | 2. Is coordinator familiar with all aspects of site operation and emergency procedures? | <u></u> | · . | |
| | 3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan? | <u> </u> | | allow superiusory personnel |
| (D) | Emergency Procedures | | | |
| · | If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56? | | | NA, no emergency situati |
| | VI. MANIFEST SYSTEM, RE | CORDKEEPING | G, AND I | REPORTING |
| | (Part 200 | Subpart E | • | |
| (A) | Use of Manifest System | Yes No | NI* | Remarks |
| | 1. Does the facility follow the procedures listed in §265.71 for processing each manifest? | <u></u> | | |
| | 2. Are records of past shipments retained for 3 years? | | | |
| B) | Does the owner or operator meet requirements regarding manifest discrepancies? | <u></u> | ——— | None to date. |

| • | - | | | ** | | | |
|-----|------------|--|-----------|--------------|---------------------------------------|---------------------------------------|-------------|
| (C) | Operati | ng Record | | | • | • | |
| | mai rec | es the owner or operator ntain an operating ord as required in .73? | <u></u> | | · · · · · · · · · · · · · · · · · · · | | |
| | con | s the operating record - tain the following ormation: | | | | | |
| | **b• | The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I? | <u>/</u> | - | · <u></u> | ···· | |
| | c. | The location and quantity of each hazardous waste within the facility? | <u> </u> | | | | |
| · . | ***d• | A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.) | | | <u>N</u> A | • | |
| | e. | Records and results of all waste analyses, trial tests, monitoring data, and operator inspections? | <u>/_</u> | | | | |
| | £ | Domosaka dakadata a | | | | · · · · · · · · · · · · · · · · · · · | |

g. All closure and post closure costs as applicable? (Effective 5-19-81) NA, mo incidents to date

Detailed breakdown available Su enclosure

f. Reports detailing all incidents that required implementation of the Contingency Plan?

^{**} See page 33252 of the May 19, 1980, Federal Register:

^{***} Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE (Part 265 Subpart G)

| _ | | • • | Yes | No | NI* | Remarks | | | |
|-----|------|--|-------------|--|-------------|-----------------------|---------|---------------------------------------|--------|
| A) | Clo | sure and Post Closure | | | | • | | | |
| | 1. | Is the facility closure - plan available for inspection by May 19, 1981? | | | | | | | - |
| | 2. | Has this plan been submitted to the Regional Administrator | | <u> </u> | <u> </u> | | | | · _ |
| • • | 3. | Has closure begun? | | <u>\(\lambda \) \(\lambda \) \</u> | / | | | · · · · · · · · · · · · · · · · · · · | |
| | 4. | Is closure estimate available by May 19, 1981? | <u>/</u> | _ | | _cost | estimot | _ | _ |
| B) | Pos | t closure care and use of property | | | | | | • | |
| | a p | the owner or operator supplied ost closure monitoring plan? fective by May 19, 1981) | | | | , | NA | | - |
| aci | lity | Name: | Yes | | ·* , | nspection: Remarks | | | |
| | | | | | | | | | |
| - | 1. | Are containers in good condition? | | | | | | | _ |
| | 2. | Are containers compatible with waste in them? | | | • | | | | |
| - | 3. | Are containers stored closed? | | - | | | | • | _ |
| | 4. | Are containers managed to prevent leaks? | | | | | | | _ |
| | 5. | Are containers inspected weekly for leaks and defects? | | | • | * 1 | | | |
| | 6. | Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.) | | | • | | | | |

| | 7. | Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) | | *** | - | |
|--------|------|---|----------------|----------|-------------|--|
| | 8. | Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? | | | | |
| : | | | | | | |
| | | | j ANKS | | | |
| ·Facil | lity | Name: Pittsburgh-Confield Cop. | | Date | of Ins | spection: 7/24/8/ |
| | 1. | Are tanks used to store only those wastes which will not cause corrosio leakage or premature failure of the tank? | n, _i_ | <u>.</u> | | System designed to handle weste processed. |
| | 2. | Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other contain ment structures? | | | | NA, Janks are not uncovered |
| | 3. | Do continuous feed systems have a waste-feed cutoff? | | | - | UA, Not a continuous feed |
| | 4. | Are waste analyses done before the tanks are used to store a substantially different waste than before? | *** | | | NA, waste strandoes not |
| | 5. | Are required daily and weekly inspections done? | V | · | | Inspections conducted daily. |
| • | 6. | Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) | | | | NA, waste not reactive or ignit |
| | 7. | Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) | ~~~ | • | . | NA, only one waste stream |
| | | | • | | | V |

Yes No

NI*

Remarks

| 5. | Associations buffer zone requir or reactive wastes? | | | le |
|-----------|---|---|----------------------|-------------|
| | Tank capacity: NA | gall | ons | |
| | Tank diameter: | feet | | • |
| | Distance of tank from property | line | feet | |
| | (See table 2 - 1 through 2 - 6 Code - 1977" to determine comp | | mable and Combustibl | e Liquids |
| • | SURFA | CE IMPORPOMENTS | | |
| Facility | Name: | · · · · · · · · · · · · · · · · · · · | Date of Inspection: | |
| 1. | Do surface impoundments have at least 60 cm (2 feet) of freeboard? | and a special control of the special control | | |
| 2. | Do earthen dikes have protective covers? | | | |
| 3. | Are waste analyses done when the impoundment is used to store a substantially different waste than before? | • | | |
| 4. | Is the freeboard level inspected at least daily? | | | |
| 5. | Are the dikes inspected weekly for evidence of leaks or deterioration? | | | |
| 6. | Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) | | | |
| 7. | Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) | | | |

LAND TREATMENT NA

| Facil | ity | Name: | Date of Inspection: _ | |
|-----------|-----|--|-----------------------|---|
| | 1. | Is treated hazardous waste capable of biological or chemical degradation? | | |
| | 2. | Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)? | | |
| | 3. | Is waste analyzed according to 265.273? | | |
| | 4. | If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276? | | |
| : * 2. | 5. | Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? | | |
| | 6. | Does the unsaturated zone moni- toring plan address the minimum information specified in 265.278? | | |
| | | Are records kept regarding application dates and rates, quantities, and locations, of all hazardous wast placed in the facility? | 2 | |
| | 8. | Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) | | |
| | 9. | Are incompatible wastes land treated? (If yes, 265.17(b) applies) | | + |

| Fa | cilit | y Name: | Da | te of | Inspect | 100: | | |
|------------------|--------------|---|------------------|-------------------|--|--|---|---|
| | | | Yes | No | NI* | Remarks | | |
| (A) _. | Gene Does | ral Operating Requirements the facility provide the following: | | | | | | · |
| | **]. | Diversion of run-on away from activ portions of the fill? | e | | *** ********************************* | - | * *** ** *** *** *** | و مل جديد تي جديد جديد |
| | **2. | Collection of run-off from active portions of the fill? | ~~~ | | ~-· | **** | | |
| | **3. | Is collected run off treated? | منعم | *** | | | | |
| | 4. | Control of wind dispersal of hazardous waste? | | | - | *** | ، سوست خيد چه چه خيد خدست د | |
| | - | (**Effective 11-19-81) | | | | | | |
| (B) | Surv Doe: | veying and Recordkeeping s the Operating Record Include: | | | | | | |
| | ٦. | A map showing the exact location and dimensions of each cell? | | | · 64-0 | ***** | * ***** ***** ** ** ** ** | |
| | 2. | The contents of each cell and the location of each hazardous waste type withing each cell? | u -ai | , | · ••• | | | . (₁₉ 19), 49 (19 19 19 19 19 19 19 19 19 19 19 19 19 1 |
| (C) | Clo | sure and Post-Closure | | | • | | | |
| | -1. | Is the Closure Plan available for inspection by 5-19-81? | | * 000 | | | | |
| | 2. | Has this plan been submitted to the Regional Administrator? | - | | | 4-2-2-4-10-2-10-10-10-10-10-10-10-10-10-10-10-10-10- | مثنه وشد واب واب مثنه مثب عبد وبد وبد وبد وبد | |
| | 3. | Has closure begun? | , | | | 600 to to to to to | | · |
| | 4. | Is closure cost estimate available by 5-19-81? | - | - **** | | कुन्स्य का संस्था का स्था क | | |
| (D |) Spe | ecial requirements for ignitable or active waste | | | • | · ··• | | |
| | + re | e ignitable or reactive waste eated so the resulting mixture no longer ignitable or reactive? | | . | | | | |

| | | Yes | No | NI* | Remarks | |
|--|--|----------|-------------|-----|---------|----------------|
| or | waste is rendered non-reactive non-ignitable see treatment uirements) | | | | | |
| If 265 | not, the provisions of 40 CFR .17(b) apply. | | | - | | |
| Spe Was | cial Requirements for Incompatible tes. | · | | | | |
| | s the owner or operator dispose of ompatible wastes in separate cells? | | | | | |
| | not, the provisions of 40 CFR .17(b) apply. | <u>:</u> | | | | -, |
| | cial requirements for liquid waste fective 11-19-81) | | | | | |
| 1. | Are bulk or non-containerized liquiplaced in the landfill? | ids | | | | |
| 2. | Does the landfill have a chemically and physically resistant liner system? | | - | | | |
| 3. | Does the landfill have a functional leachate collection system? | | | | • | |
| 4. | Are free liquids stabilized prior to or immediately after placement in the landfill? | | | —— | | |
| Spec | cial requirements for Containers fective 11-19-81) | · | | | | |
| Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? | | ne | | | | |

O and P INCINERATION and THERMAL TREATMENT NA

| F | acility Name: | | | | | | | | | |
|-------------|---|---------------------------------------|---|-------------|-------------|---------------|--------------|---------------------------------------|---------------------------------------|---------------|
| . D | ate of Inspection: _ | · · · · · · · · · · · · · · · · · · · | | | | · | | | | |
| | | | _ | | | | | • | | |
| | | I. Determ | minatio | n of | Ste. | adv Sta | te | • | | |
| | | 1. Determ | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | | <u> </u> | ady oud | <u></u> | | • | - |
| Ту | pe of unit (i.e., type | e of incinera | ator or | the | rmal | treatm | ent): _ | _ | | |
| | | | , | | | e and the | | | | |
| | mponents and steady s | tate conditio | nn • | | | | | • • • | | |
| CO | imponence and seeding s | | | i.lac | +hic | compon | ont at C | S prior to | n addin | ים אים כיי |
| | · . | | 7 | | | | | S prior to | , addini | i was |
| | Compone | ent | , | Yes | No . | NI* | Remari | KS. | | ÷ |
| | *. | | | | | - ' | | : | | |
| | | | • | | | | <u></u> | | | , |
| | | · · · · · · · · · · · · · · · · · · · | • | | | | | · · · · · · · · · · · · · · · · · · · | · · · · · · · · · · · · · · · · · · · | |
| | | | - | | | | | | | |
| | | | . • | | | | | <u>,</u> | | |
| | A A A A A A A A A A A A A A A A A A A | · · · · · · · · · · · · · · · · · · · | | | | | | | | ···· |
| | • | | | | | | - | | | |
| | | II. | Wast | e Ar | alys | <u>is</u> | | | | |
| Mi | nimum requirements, fo | or wastes not | nrevi | กมรใ | v hin | rned/tr | eated. | | | |
| | | | | | | | | | | |
| ٠ | Required analys analysis been p | performed | | 162 | IVO | 1/1 ~ | Keman | < 5 | | |
| | for the follow | ing? | | | | | | | · | |
| | a. Heating va | lue | - | | | | | | | |
| | b. Halogen co | ntent | - | | | | · <u></u> | <u> </u> | | |
| | c. Sulfur con | tent | | | | <u>.</u> | | | | |
| | | . • | - | | | - | | | | |

| 2. | Has documented or writen data been substituted for analysis of either: | | | | | |
|----------------------|---|----------------|----------|---------------|---------------------------------------|-------------|
| | a. Lead? | | | | · · · · · · · · · · · · · · · · · · · | |
| | b. Mercury? | | | . | | |
| steady s | er parameters for which the waste tate or determine the types of po any which you feel should be test | lluta | | | be emitted. | (Note in |
| 1. | | | | | Remark | S |
| 2. | | | • | | | |
| 3. | | | | | | |
| ٠٠ 4. | | | | | | |
| 5. | | | | | | _ |
| | III. Monitoring | g and | Inspe | ections | | |
| | | Yes | No | NI* | Remarks | |
| | ustion/emission control instrument d at least every 15 minutes? | ts —— | | | : | |
| Is stead attempte | y state maintained or corrections d? | | | | | |
| | plume observed at least hourly al color and opacity? | | <u>.</u> | | | |
| owner or | stack observations made by operator show a plume dif- han normal?** | · | | | | |
| | o D above, were corrections return emissions to normal ce?** | | | | | |
| ment ins | complete unit and associated equip pected daily for leaks, spills, tive emissions? |) - | | | | |
| system a | gency shutdown controls and larms checked daily for peration? | | | | 714 | |
| | | | | | | • |

Not Inspected

Spe y in Remarks for what period of time this was checked.

IV. Upen Burning

A. Only complete this part if the facility open burns hazardous waste.

| | | Yes | No | NI* | Remarks | |
|----|--|-----|-------------|------------|---------|-------------|
| 1. | Does this facility burn only waste explosives? (A No answer means other | | | | | |
| | hazardous waste is open- burned.) | · | | · <u> </u> | | |
| 2. | If this facility open- burns waste explosives, does it burn the waste at a distance greater than or equal to the | | | | | |
| | minimum specified distance (below) | | | · . | | |

| Pounds of waste explosives or propellants | Minimum distance from open burning or detonation to the property of others |
|---|--|
| 0 to 100 | 380 m 1,250 ft 530 m 1,730 ft |

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT.

| Fac | ility Name: Pittslungh-Can | sild Corp. | | | |
|-----|--|------------|----------|---------|------------------------|
| Dat | e of Inspection: 7/24/81 | Yes No | N1 * | Remarks | X 1 1 1 1 |
| 1. | Is equipment used to treat only those wastes which will not cause | 162 110 | N.L | Remarks | 141 |
| | leakage, corrosion, or premature failure? | | . 12 | Curren | turit is 15 years old. |
| 2. | Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control | | | AlA m | ot a continuous_ |
| | (e.g., cut-off system?) | | <u> </u> | feeds | ystin |

| | | Yes | No | NI* | Remarks | |
|-----|--|---------------------------------|------------------------|------------------------------|--|--|
| 3 | Has the owner or operator addressed the waste analysis requirements of 265.402? | <u></u> | | | Botch Rec | ndis prepared |
| 4. | Are inspection procedures followed according to 265.403? | <u>./</u> | | | | |
| 5. | Are the special requirements fulfilled for ignitable or reactive wastes? | | | | NA | |
| 6. | Are incompatible wastes treated? (If yes, 265.17(b) applies.) | | <u>v</u> | · | 4 | |
| | 402 or 307(b) of the Clean Water Act (tanks, transport vehicles, vessels, or hazardous only because they exhibit the or are listed as hazardous wastes in Scomplete this section if the owner or ophazardous waste that is subsequently shidisposal. | conta e corr ubpart IX | nners rosivi Dof | ty char ty char 40 CFI | neutralize was racteristic und R Part 261 only | stes which are der 40 CFR §261.22 v for this reason. |
| | 1. MANIFEST | REQU | IREME | NTS | | |
| | | Yes | No | NI* | Remarks | |
| (A) | Does the operator have copies of the manifest available for review? | <u>v</u> | | | Copy of somp | le manifest mencloses |
| (B) | Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements) | | | | | |
| | 1. Manifest document number? | | _ | · · | | |
| | Name, mailing address, telephone number, and EPA ID Number of Generator | | _ | | | |

| | 3. | Name and EPA ID Number of Transporter(s)? | <u></u> | |
|----|------------------|--|------------------|--|
| | 4. | Name, address, and EPA ID Number of Designated permitted facility and alternate facility? | <u> </u> | |
| | 5. | The description of the waste(s) (DOT shipping name, DOT hazard class DOT identification number)? | | |
| | 6. | The total quantity of waste(s) and the type and number of containers loaded? | | |
| | 7. | Required certification? | <u> </u> | |
| | 8. | Required signatures? | | |
| C) | | s the owner or operator submit eption reports when needed? | | |
| | | 2. PRE-TRANSF | ORT REQUIREMENTS | |
| A) | wit (Re | waste packaged in accordance h DOT Regulations? equired prior to movement of eardous waste off-site) | | |
| В) | in con (Re | waste packages marked and labeled accordance with DOT regulations accerning hazardous waste materials? equired to movement of hazardous te off-site) | | |
| C) | If to | required, are placards available transporters of hazardous waste? | <u></u> | |
| | | | | |

Yes

No

Remarks

3. On Site Accumulation

| | | Yes | No | NI* | Remarks |
|----|---|-----|-------------|-----|---------|
| ١. | Are containers marked with start of accumulation date? | | | · · | |
| 2. | Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days? | | | · · | |
| 3. | Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line? | | | | |
| 4. | If wastes are stored in tanks, are the tanks managed according to the following requirements? | | - | | |
| | a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank? | | | | |
| • | b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures? | | | | |
| | c. Do continuous feed systems have a waste-feed cutoff? | | | | |
| | d. Are required daily and weekly inspections done? | | | | |
| | e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements? | | | e e | -··· |
| | f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply) | | | - | |

VI. RECORDKEEPING and REPORTING (Part 262, Subpart D)

| | | | Yes | No | MI* | Remarks |
|-----|--------------|--|------------------|---------|-------------|----------------------------|
| (A) | Exce resu | Manifests, Annual Reports, ption Reports, and all test - lts and analyses retained for east three years? | <u>/</u> | | · . | |
| (B) | Annua | the generator submitted al Reports and Exception rts as required? | | | ••••• | NA, Not meided to date |
| | | VII. INTERNA (Part 262 | ATIONA 2, Sub | L SHIP | PMENTS | |
| | | the installation imported xported Hazardous Waste? | · · | | | All waste guerated on site |
| | | (If answered Yes, complete the d | Follow | ring as | applic | cable.) |
| | | Exporting Hazardous waste, nas a generator: | | | | |
| | ć | a. Notified the Administrator in writing? | | <u></u> | - | |
| | . 1 | o. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? | | | · | • |
| | c | . Met the Manifest requirements? | | | | |
| · | | Importing Hazardous Waste, has the generator: | ٠ | | | |
| | | Met the manifest requirements? | | | | |

TRANSPORTER REQUIREMENTS 40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING (Subpart B)

| Are copies of the completed manifests or shipping paper(s) available for review and retained for three years? II. INTERNATIONAL SHIPMENTS A. Does the transporter record on the manifest the date the waste left the U.S.? 3. Are signed completed manifest(s) on file? V. MISCELLANEOUS A. Does transporter transport hazardous waste into the U.S. from abroad? 3. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? OTE: If (A) or (8) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations. | | | | | | the state of the s | |
|--|--|----------------------|---------------------------------------|------------|----------|--|-----|
| manifests or shipping paper(s) available for review and retained for three years? II. INTERNATIONAL SHIPMENTS A. Does the transporter record on the manifest the date the waste left the U.S.? 3. Are signed completed manifest(s) on file? V. MISCELLANEOUS A. Does transporter transport hazardous waste into the U.S. from abroad? 8. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? OTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations. | | | Yes No | NI* | Remarks | | |
| A. Does the transporter record on the manifest the date the waste left the U.S.? 3. Are signed completed manifest(s) on file? V. MISCELLANEOUS 4. Does transporter transport hazardous waste into the U.S. from abroad? 3. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? OTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations. | <pre>manifests or shipping paper(s) available for review and</pre> | | | | | | · |
| manifest the date the waste left the U.S.? 3. Are signed completed manifest(s) on file? V. MISCELLANEOUS 4. Does transporter transport hazardous waste into the U.S. from abroad? 3. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? OTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations. | <u>II.</u> | INTERNATI | OINAL SHIF | MENTS | | | ÷ |
| V. MISCELLANEOUS A. Does transporter transport hazardous waste into the U.S. from abroad? 3. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? OTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations. | manifest the date the waste left | the the | | | | | |
| A. Does transporter transport hazardous waste into the U.S. from abroad? 3. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? OTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations. | 3. Are signed completed manifest(s) on file? |) | | ********** | | | |
| hazardous waste into the U.S. from abroad? 3. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? OTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations. | | V. MISC | ELLANEOUS | | .* | | , |
| hazardous waste of different DOT shipping descriptions by placing them into a single container? OTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations. | hazardous waste into the | | · · · · · · · · · · · · · · · · · · · | | | | |
| comply with the Generator regulations. | hazardous waste of different DOT shipping descriptions by placing them into a single | | | | | | |
| comply with the Generator regulations. | | | | | | | |
| comply with the Generator regulations. | | | | | | · | |
| Inspected | OTE: If (A) or (B) were answered "' comply with the Generator reg | Yes" then tulations. | the Transp | orter i | s also a | Generator and mu | ıst |
| ' Inspected | | | | | | | |
| | ' Inspected | | | | | | • |

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

DEFICIENCY NOTIFICATION TABLE ISS INSPECTION

FACILITY NO. - 81-HW-U334,
OWNER - WHEELING-PITISBURGH STEEL CORPORATION
FACILITY NAME - PITISBURGH-CANFIELD CORPORATION
FACILITY LOCATION - 460 W. MAIN ST. CANFIELD, OHIO
FACILITY CONTACT - BILL SAMPLES'
ISS INSPECTION DATE - 7/24/81

PHONE NO. - 304-234-2936

| • | COLUMN I | COLUMN II | COLUMN III | COLUMN IV | COLUMN V | COLUMN VI |
|----------------|-----------------|--------------------------|------------------|-----------------------|------------------------|-------------|
| Page | Item No. | OAC Reference | USEPA Reference | See Code Following | Refer To ISS Remark | OEPA Use |
| 3 | III A 1 | 3745-55-12(A) | 265.12 (A) | | ~ | • |
| | B 1 2 | 3745-55-13 3745-55-13 | 265.13 265.13 | | | |
| | 3 C 1 | 3745-55-14 | 265.14 | | <u> </u> | |
| | 2 3 | 11 | 11 | · | レ | |
| ¥. | D 1 | 3745-55-15 | 265.15 | | <u> </u> | |
| 4 | 34 | II II | 11 | | | |
| . . | 5 6 | 11 H | - n | | <u> </u> | |
| | <u>7</u> 8 | 11 | 11 | | ساس | |
| , | E 1 | 3745-55-16 | 265.16 | | | |
| | 3 4 5 | 11 | 11 | | | |
| | 6 F 1 | 3745-55-17 | 265,17 | | ~ | |
| | 2 3 | 11 11 | 11 11 | | <u> </u> | |
| 5 | IV A 1 | 3745-55-31 3745-55-32 | 265.31 265.32 | | | |
| | 2 3 | 3745-55-33 | 265.33 | | • | |
| | C 1 2 D 1 | 3745-55-34 | 265.34 | : | | |
| <u> </u> | V A T | 3745-55-35 3745-55-52 | 265.35 265.52 | В | ~ | |

| | • | | | | | | | Per service services |
|--|--------------|------------------|---------------|--------------------------|-----------------|-----------------------|------------------------|----------------------|
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| | VIII | I |] | 3745-56-51 | 265.171 | | | |
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| | 6 | 3745-57-37 | 265.257 | | | | |
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| IX | I (A) (B) 1 | 3745-52-40 3745-52-21 | 262.40 262.21 | | | |
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| | d | 3745-56-74 | 265.184 | | - | |
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KEY TO CODED ITEMS (COLUMN IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 30 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.

HWFAB #22-50-0336 Groundwater Monitoring If the site is a TSDF, check the boxes indicating which regulations are applicable. EPA 1.D. # 0H OCCUTS 7775 538-331 Land Treatment D81 Chemical/Physical/ Biological TO4 City: (ANFIELD) Waste Piles S03 (Telephone) Landfills D80 Post-Closure 216-425-0171 -533-3311 Telephone: 2/6 U.S. General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure MAHONING INSPECTION PARTICIPANTS(S) Incineration/Thermal Treatment INSTALLATION ACTIVITY Address: 460 W. MAIN ST Surface Impoundments S04/T02 (Title) ENGINEER INSPECTOR(S) 44406 County: ENVIRONMENTAL Containers SO HIEF Tanks S02/T01 Zip Code:_ Facility: PITTSBURG CANFIELD CORP. GENERAL INFORMATION TRADLER Generator only (G) FRAZIER (Name) Transporter (T) TSDF only MARCULIN OHO G-T-TSDF 7HP15 G-TSDF T-TSDF G-7 Mark One PART 1. State: B ż

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N/A

Remark #

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- . Has the facility submitted a Part A to Ohio?
- 2. If "yes", is it complete and accurate?
- 3. Has the facility submitted a Part B?

REMARKS, PART 1. GENERAL INFORMATION Include a brief description of site activity and waste handling.

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| l. The hazardous waste(s) generated at this facility have been tested or are | acknowledged to be hazardous waste(s) as defined in Section 261 and in | compliance with the requirements of Sections 262.11. |
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- Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)? 2
- Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).
- generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest: 4.
- The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22. (B)
- and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20. The generator has designated at least one permitted disposal facility q
- Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23. \hat{c}

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- The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b) G
- Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 (e

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| | The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34). | The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34). | b) The date that accumulation began is clearly marked on each container. | The containers are clearly marked with the words "Hazardous Waste". | If the generator elects to store hazardous waste on-site in <u>containers</u> or tanks for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met: | Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50. | c) The generator meets requirements for properly placarding or affering to properly placard the initial transporter of the waste material in com- pliance with Section 262.33. | Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b). | a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) | The generator meets the following hazardous waste pre-transport requirements: | | |
| ŀ | | | | | · | | K | <u> </u> | | | Yes | |
| | | K | K | < | | | | | | | No | |
| | | | | | | <u></u> | | | <u> </u> | | N/A | |
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SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM. NOTE

REMARKS, PART 2. GENERATOR REQUIREMENTS

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PART 3. TRANSPORTER REQUIREMENTS

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| ity has registered with the Public Utilities Commission of Ohio as a | |
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| registere | ter of hazardous waste. |
| has | of O |
| ne entity | ransporter |
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- he transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Section 262.
- The transporter has signed the manifest as required by Section 263.20(b) and has carried the manifest with the waste shipment as required by 263.20(c).
- Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20(and has retained a signed copy (available for inspection) for at least 3 years
- The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21). ь,
- If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Section 263.20(e)(f).
- retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c). If hazardous waste has been shipped out of the country, the transporter has
- Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control? ထံ
- Was immediate action taken? (Notify authorities, dike discharge) (263.30(a)

| Remark # | | | | | | |
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| | | | | | | |
| No | | \setminus | | | | 7 1 |
| Yes | \rightarrow | | | \rightarrow | | |
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| 11. Does the transporter mix hazardous wastes of different U.S. DOT ship descriptions by placing them into a single container? | 10. Does the transporter import hazardous waste into the United States? | NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRAISTORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTIFACTION FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRAISTORAGE. | a) Manifested wastes are not stored for longer than 10 days ("Trans Facility") and remain properly DOT-packaged during storage (263. | 9. Does the transporter store hazardous water transit? | c) Was the discharge cleaned up as required by Section 263.31? | b) Were all of the notifications required by Section 263.30(c)(d) | |
|---|---|--|---|---|--|---|----------|
| es of different U.S. DOT shipping gle container? | aste into the United States? | ANSFER FACILITERIM STATUS T SPECIFICALL REGULATION. | or longer than 10 days ("Transfer packaged during storage (263.12). | transporter store hazardous waste temporarily while they are in | quired by Section 263.31? | red by Section 263.30(c)(d) made? | |
| | | Y REQUIREMEN EQUIREMENTS AUTHORIZED | | | | | Yes |
| K | <u> </u> | REQUIREMENTS AND UIREMENTS FOR STI | | < | | | 8 |
| | | TY REQUIREMENTS AND SUCH REQUIREMENTS FOR STORAGE Y AUTHORIZED UNDER SECTION | K | | K | K | N/A |
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REMARKS, PART 3. TRANSPORTER REQUIREMENTS

A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTION 263.10(c) BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTION 262.

NOTE:

Subpart C: Preparedness and Prevention

Remark

N/A

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- fire, explosion or non-planned release of hazardous waste at (265.31) Has there been a this facility? (
- If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)
- a) Internal alarm system.
- Access to telephone, radio or other device for summoning emergency assistance. (q
- c) Portable fire control equipment.
- Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers. Ŧ
- All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) 8
- If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) 4.
- If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) ى .
- emergency service authorities to familiarize them with the possible hazards If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local (265.37(a) and the facility layout. ė.
- Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)

| If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56. | An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) | The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) | A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) | e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) | d) A list of all emergency equipment including location, physical description and outline of capabilities, | Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. | b) Arrangements or agreements with local or state emergency authorities. | a) Actions to be taken by personnel in the event of an emergency incident. | The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components: | Subpart D: Contingency and Emergency | |
|--|---|---|--|---|--|--|--|--|---|--------------------------------------|----------|
| | | K | <u> </u> | | | K | K | K | | | Yes |
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| <u> </u> | | | | K | | | | | | | N/A |
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PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

| | d _i | |
|---|----------------------|-----------------------------------|
| Q: Chemical/Physical/Biological Treatment | N: Landfills Q: | K: Surface Impoundments |
| Thermal Treatment | M: Land Treatment P: | <pre>J: Management of Tanks</pre> |
| 0: Incinerators | | I: Management of Containers |

Remark

N/A

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Yes

| Hazardous wastes are stored in containers which are: a) Closed (265.173) b) In good physical condition (265.171) c) Compatible with the wastes stored in them (265.172) 2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) 3. Hazardous waste containers are not stored, handled or opened in a manner which may rubture the container or cause it to leak. (265.173(b)) | | k | | \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\ | | \ <u>\</u> |
|--|---|---------------------|---|--|---|---|
| | 1. Hazardous wastes are stored in containers which are: | a) Closed (265.173) | b) In good physical condition (265.171) | c) Compatible with the wastes stored in them (265.172) | 2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) | 3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b)) |

- The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) (\$150)
- Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176). υ,
- Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c) ė.

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- Has the facility submitted a part B?

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TABLE 1 SOLID WASTE MANAGEMENT UNITS

| SWMU <u>Number</u> | SWMU Name | RCRA Hazardous Waste Management Unit ^a | Status |
|-----------------------|--|--|-------------------------------------|
| I | Satellite Accumulation Areas (SAA) | No | Active |
| 2 . | Former Waste Chrome Solution Treatment Area | Yes | Inactive, but not RCRA closed |
| 3 | Sodium Carbonate Crystal Tray | No | Active |
| 4 | Waste Filter Cake and Miscellaneous Floor Sweepings Accumulation Area | No | Active |
| 5 | Waste Skimmed Oil Tanks | No | Active |
| 6 | Waste Zinc Phosphate Solution and Rinse Water Tank Area | . No | Active |
| 7 | Waste Zinc Phosphate Solution and Rinse Water Tank Staging Area | No | Active |
| 8 | Flammable Liquids Storage Shed | No | Active for less than 90-day storage |
| 9 | Storage Building | No | Active for less than 90-day storage |
| 10 | Former Container Accumulation Area | No . | Inactive |
| 11 | Main Building Nonhazardous Waste Accumulation Area | No | Active |
| 12 | Roll Grindings Dust Collector | No | Active |

A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

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PRC Environmental Management, Inc. 233 North Michigan Avenue Suite 1621 Chicago, IL 60601 312-856-8700 Fax 312-938-0118



PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

PITTSBURGH-CANFIELD CORPORATION CANFIELD, OHIO OHD 000 810 283

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Waste Programs Enforcement Washington, DC 20460

Work Assignment No. : C05087

EPA Region : 5

 Site No.
 : OHD 000 810 283

 Date Prepared
 : March 19, 1993

 Contract No.
 : 68-W9-0006

PRC No. : 009-C05087OH5U

Prepared by : PRC Environmental Management, Inc.

(Peter Lynch)

Contractor Project Manager : Shin Ahn

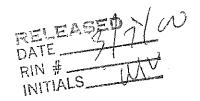
Telephone No. : (312) 856-8700 EPA Work Assignment Manager : Kevin Pierard Telephone No. : (312) 886-4448

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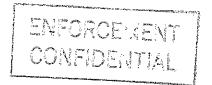
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EXECUTIVE SUMMARY



PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Pittsburgh-Canfield Corporation (PCC) facility in Canfield, Mahoning County, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The PCC facility cleans, electrogalvanizes, chrome plates, and paints coiled steel and manufactures metal rulers. The facility also cuts and packages the finished product before shipment off site. The facility generates and manages the following hazardous waste streams: waste paint thinner (F003, F005), waste paint rags (D035), waste scrap paint (D007, D008, and F003), waste chromic acid (D002, D007), waste chromic acid sludge (D007), waste Keylite^m (D007), waste chrome flakes (D007), roll grindings dust (D007), waste sodium carbonate crystals (D002, F008), waste calcium carbonate filter cake (F008), miscellaneous housekeeping wastes (F008), cell sludge waste (D002, F008), and waste filter sludge (F008). The facility also generates and manages the following nonhazardous waste streams: dried paint scrapings waste, iron phosphate oily sludge waste, waste skimmed oil, waste zinc phosphate solution, waste zinc phosphate rinse water, zinc phosphate sludge waste, and waste nitric acid.

The facility has operated at its current location since the late 1940s. The facility occupies 9 acres in a mixed-use area and employs about 60 people.

Canfield Steel (Canfield) built the original facility in the late 1940s. The facility was purchased by Pittsburgh Steel in the mid-1960s and was renamed Pittsburgh-Canfield Corporation (PCC). Pittsburgh Steel merged with Wheeling Steel in the late 1960s and the facility is currently a subsidiary of Wheeling-Pittsburgh Steel Corporation. Prior to the late 1940s, the land was undeveloped.

Canfield began manufacturing and painting metal venetian blind panels in the late 1940s. In the mid-1950s, Canfield began zinc electrogalvanizing of coiled steel. In the early 1960s, the Canfield facility began coiled steel slitting activities. In the mid-1980s, the PCC facility ceased

manufacturing and painting metal venetian blind panels and began manufacturing metal rulers. The PCC facility currently cleans, electrogalvanizes, chrome plates, and paints coiled steel and manufactures metal rulers.

The PCC facility has not submitted a closure plan for the Former Waste Chrome Solution Treatment Area (SWMU 2). The facility submitted a notice of withdrawal from the Part A permit system to the Ohio Environmental Protection Agency (OEPA) in September 1982 and to the EPA in August 1983. In May 1986, the PCC facility submitted a Request for Change in Status Certification form to EPA. During a review of EPA and OEPA files, PRC was unable to locate a EPA written determination of the PCC facility's regulatory status. The facility currently operates as a large-quantity generator of hazardous waste storing waste for less than 90 days.

The PA/VSI identified the following 12 SWMUs and no AOCs at the facility:

Solid Waste Management Units

- 1. Satellite Accumulation Areas (SAA)
- Former Waste Chrome Solution Treatment Area
- 3. Sodium Carbonate Crystal Tray
- 4. Waste Filter Cake and Miscellaneous Floor Sweepings Accumulation Area
- 5. Waste Skimmed Oil Tanks
- 6. Waste Zinc Phosphate Solution and Rinse Water Tank Area
- 7. Waste Zinc Phosphate Solution and Rinse Water Tank Staging Area
- 8. Flammable Liquids Storage Shed
- 9. Storage Building
- 10. Former Container Accumulation Area
- 11. Main Building Nonhazardous Waste Accumulation Area
- 12. Roll Grindings Dust Collector

The potential for a release of hazardous constituents to the ground water, surface water, air, and on-site soils for all facility SWMUs is low. All SWMUs are located indoors on concrete floors. Waste is managed in closed containers and level topography at the facility would be expected to limit contaminant migration.

Waste containing volatile organic compounds (VOC) is stored for less than 90 days in closed containers at SWMUs 1 and 8. SWMUs 1 and 11 manage solid, nonhazardous dried paint waste, iron phosphate oily sludge waste and zinc phosphate sludge waste. SWMUs 5, 6, and 7 do not manage waste containing VOCs.

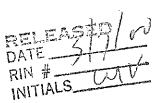
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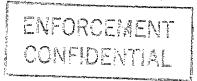
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The PCC facility has not submitted a closure plan for the Former Waste Chrome Solution Treatment Area (SWMU 2); however, treatment of waste chrome solution was discontinued in 1982, and the unit was dismantled in 1983. SWMU 2 was located indoors, was completely enclosed, and did not manage waste containing VOCs. During the VSI, facility representatives showed PRC the location of SWMU 2 as described in the facility's Part A permit application and facility representatives. At a later date, facility representatives informed PRC that SWMU 2 was located in an area not shown to PRC during the VSI. According to PCC, SWMU 2 is located about 25 feet north of the chrome flakes SAA (SWMU 1).

Receptors of potential releases from the facility include PCC employees as well as residents of Canfield. Access to the facility is limited by a fence surrounding the active portions of the facility and 24-hour electronic security. The nearest resident is located about 400 feet west of the facility. A small wetland area is located about 0.6 miles southeast of the facility.

PRC recommends that RCRA closure be completed at the Former Waste Chrome Solution Treatment Area (SWMU 2) if documentation of its change of status cannot be located. PRC recommends that waste management practices be improved at the waste paint thinner, waste paint rags, and waste scrap paint SAAs (SWMU 1) since stains were noted at these areas. PRC recommends that holes along the south wall of the Flammable Liquids Storage Shed (SWMU 8) be repaired. PRC recommends no further action for the Sodium Carbonate Crystal Tray (SWMU 3), the Waste Filter Cake and Miscellaneous Floor Sweepings Accumulation Area (SWMU 4), the Waste Skimmed Oil Tanks (SWMU 5), the Waste Zinc Phosphate Solution and Rinse Water Tank Area (SWMU 6), the Waste Zinc Phosphate Solution and Rinse Water Tank Staging Area (SWMU 7), the Storage Building (SWMU 9), the Former Container Accumulation Area (SWMU 11), and the Roll Grindings Dust Collector (SWMU 12).





1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Pittsburgh-Canfield Corporation (PCC) facility (EPA Identification No. OHD 000 810 283) in Canfield, Mahoning County, Ohio. The PA was completed on November 18, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and from EPA Region 5 RCRA files. Additionally, PRC gathered and reviewed information from the Federal Emergency Management Agency (FEMA), the U.S. Department of Agriculture (USDA), and from the United States Geological Survey (USGS). The VSI was conducted on December 2, 1992. It included interviews

with facility representatives and a walk-through inspection of the facility. PRC identified 12 SWMUs and no AOCs at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 14 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

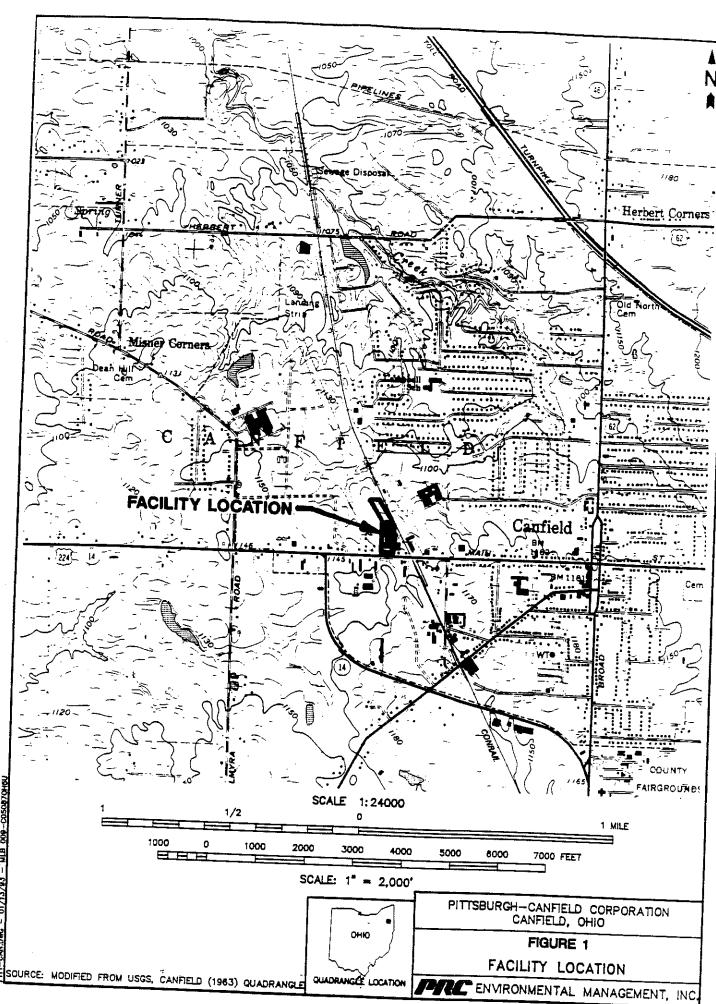
The PCC facility is located at 460 West Main Street in Canfield, Mahoning County, Ohio. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41°01'30"N and longitude 80°47'00"W). The facility occupies 9 acres in a mixed-use area.

The facility is bordered on the north by undeveloped land and railroad tracks, on the west by a small commercial business, on the south by Route 224 (Main Street) and undeveloped land, and on the east by the Standard Slag Company and railroad tracks.

2.2 FACILITY OPERATIONS

Canfield Steel (Canfield) built the original facility in the late 1940s. The facility was purchased by Pittsburgh Steel in the mid-1960s and was renamed Pittsburgh-Canfield Corporation (PCC). Pittsburgh Steel merged with Wheeling Steel in the late 1960s and the facility is currently a subsidiary of the Wheeling-Pittsburgh Steel Corporation (WPC). PCC currently operates as a subsidiary of WPC. Prior to the late 1940s, the land was undeveloped. PCC has operated at the facility since the late 1960s and employs about 60 people.

Canfield began manufacturing and painting metal venetian blind panels in the late 1940s. In the mid-1950s, Canfield began zinc electrogalvanizing and chrome plating of coiled steel. In this process, coiled steel is unrolled and submerged in a bath of zinc and iron phosphate solution, then submerged in a series of baths containing zinc cyanide solution, then submerged in a series of plating baths, or cells, where it is chrome plated with a chromic acid solution. In the early 1960s, the Canfield facility began cutting coiled steel and painting activities using a zinc phosphating process. Coiled steel is immersed in a tank containing a zinc phosphate solution to create a surface for paint adhesion. In the mid-1980s, manufacturing of venetian blind metal panels ceased and was replaced by the manufacturing of metal rulers.



The PCC facility cleans, electrogalvanizes, and chrome plates coil steel. The facility also paints coiled steel and manufactures metal rulers. Xylene and methyl ethyl ketone (MEK)-containing paint thinner is used to clean painting equipment. Alkaline cleaners are used to clean coiled steel. Sodium cyanide, sodium hydroxide, and zinc are used in coiled steel electrogalvanization. Chrome is used during chrome plating operations, and liquid paint is used in coiled steel painting operations.

Xylene and MEK-containing paint thinner product is stored in 55-gallon drums in the Flammable Liquids Storage Shed (SWMU 8). Alkaline cleaners are delivered to the facility in 55-gallon drums and 330-gallon totes and are stored in the north end at the main building. Sodium cyanide in the form of briquettes, sodium hydroxide, and zinc, in the form of 2-inch spheres, are stored in 30-gallon drums, 330-gallon totes, and 125-cubic-foot steel containers, respectively, near process areas in the main building. Liquid paint product is stored in 55-gallon drums in a paint vault in the north end of the main building.

The facility consists of a combined office and production building (the main building), a Flammable Liquids Storage Shed (SWMU 8), a Storage Building (SWMU 9), and a parking area. Offices occupy about 3,640 square feet in the south end of the main building. Coiled steel cleaning, electrogalvanizing, plating, painting, storage, slitting, and packaging areas occupy about 80,360 square feet in the main building. Shipping and receiving docks are located on the north and south sides of the main building. A 900-square-foot enclosed paint thinner product storage and waste accumulation building, the Flammable Liquids Storage Shed (SWMU 8), is located northeast of the main building. A 6,000-square-foot equipment storage and waste accumulation building, the Storage Building (SWMU 9) is located north of the main building. A parking area is located south of the main building.

Solid wastes generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

2.3 WASTE GENERATION AND MANAGEMENT

The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

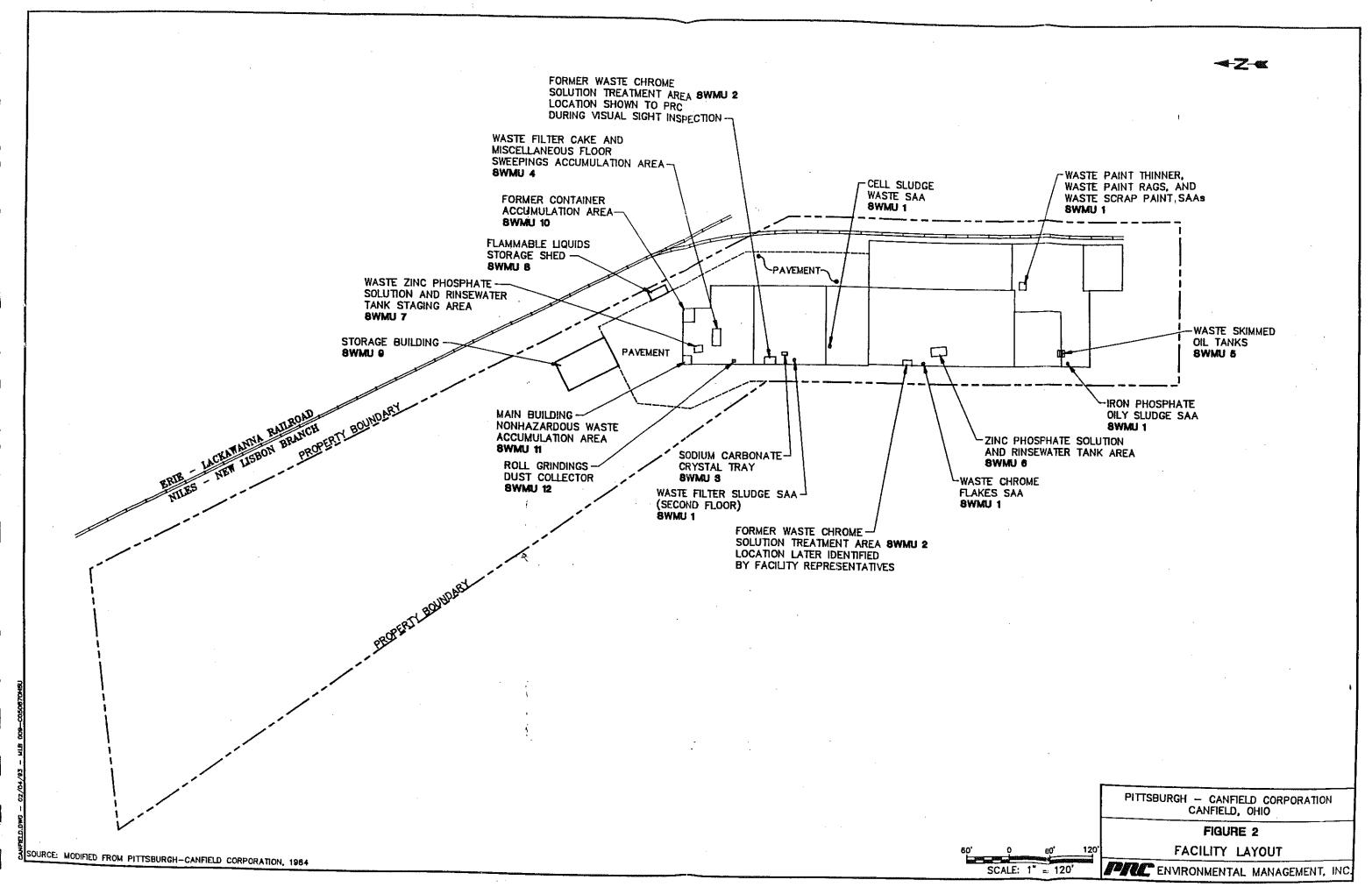
TABLE 1
SOLID WASTE MANAGEMENT UNITS

| SWMU <u>Number</u> | SWMU Name | RCRA Hazardous Waste Management Unit ^a | Status |
|-----------------------|--|--|-------------------------------------|
| 1 | Satellite Accumulation Areas (SAA) | No | Active |
| 2 | Former Waste Chrome Solution Treatment Area | Yes | Inactive, but not RCRA closed |
| 3 | Sodium Carbonate Crystal Tray | No | Active |
| 4 | Waste Filter Cake and Miscellaneous Floor Sweepings Accumulation Area | No | Active |
| 5 | Waste Skimmed Oil Tanks | No | Active |
| 6 | Waste Zinc Phosphate Solution and Rinse Water Tank Area | No | Active |
| 7 | Waste Zinc Phosphate Solution and Rinse Water Tank Staging Area | No | Active |
| 8 | Flammable Liquids Storage Shed | No | Active for less than 90-day storage |
| 9 | Storage Building | No | Active for less than 90-day storage |
| 10 | Former Container Accumulation Area | No | Inactive |
| 11 | Main Building Nonhazardous Waste Accumulation Area | No | Active |
| 12 | Roll Grindings Dust Collector | No | Active |
| Note: | | | |

Note:

A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

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TABLE 2 SOLID WASTES

| Waste/EPA Waste Code ^a | Source | Solid Waste <u>Management Unit^{b, c}</u> |
|--|---|--|
| Waste Paint Thinner / F003, F005 | Painting operations | SWMUs 1 and 8 |
| Waste Paint Rags / D035 | Painting operations | SWMUs 1 and 8 |
| Waste Scrap Paint / D007, D008, F003 | Painting operations | SWMUs 1 and 8 |
| Waste Chromic Acid / D002, D007 | Chromic plating operations | SWMUs 2 and 9 |
| Waste Chromic Acid Sludge / D007 | Chrome plating cells | SWMUs 1 and 9 |
| Waste Keylite™ / D007 | Dry chrome plating operations | SWMU 9 |
| Waste Chrome Flakes / D007 | Routine cleaning of chrome plating equipment | SWMUs 1 and 9 |
| Roll Grindings Dust / D007 | Grinding of rubber- covered rollers | SWMUs 9 and 12 |
| Waste Sodium Carbonate Crystals / D002, F008 | Electrogalvanizing solution treatment operations | SWMUs 3, 9, and 10 |
| Waste Calcium Carbonate Filter Cake / F008 | Electrogalvanizing solution treatment operations | SWMUs 4, 9, and 10 |
| Miscellaneous Housekeeping Wastes / F008 | Routine cleaning of electrogalvanizing equipment | SWMUs 1, 4, 9, and 10 |
| Cell Sludge Waste / D002, F008 | Electrogalvanizing cells | SWMUs 1, 9, and 10 |
| Waste Filter Sludge / F008 | Continuous filtering of electrogalvanizing solution | SWMUs 1, 9, and 10 |
| Dried Paint Scrapings Waste / NA | Painting operations | SWMU 8 |
| Iron Phosphate Oily Sludge Waste / NA | Coiled steel cleaning operations | SWMUs 1 and 11 |

TABLE 2 (Continued) SOLID WASTES

| Waste/EPA Waste Code ^a | Source | Solid Waste <u>Management Unit</u> | | | |
|---------------------------------------|--------------------------------------|------------------------------------|---|--|--|
| Waste Skimmed Oil / NA | Coiled steel cleaning operations | SWMU 5 | | | |
| Waste Zinc Phosphate Solution / NA | Coiled steel paint pretreatment tank | SWMU 6 | | | |
| Waste Zinc Phosphate Rinse Water / NA | Zinc phosphate rinsing tank | SWMU 6 and 7 | | | |
| Waste Zinc Phosphate Sludge / NA | Coiled steel paint pretreatment tank | SWMU 1 and 11 | | | |
| Waste Nitric Acid Solution / NA | | SWMU 6 | | | |
| | | | ÷ | | |
| Note: | | | | | |
| Not applicable (NA) designates n | onhazardous waste. | | - | | |

The PCC facility currently generates 13 hazardous and 7 nonhazardous waste streams. The hazardous waste streams generated at the facility consist of waste paint thinner (F003, F005), waste paint rags (D035), waste scrap paint (D007, D008, F003), waste chromic acid (D002, D007), waste chromic acid sludge (D007), waste Keylite^m (D007), waste chrome flakes (D007), roll grindings dust (D007), waste sodium carbonate crystals (D002, F008), waste calcium carbonate filter cake (F008), miscellaneous housekeeping waste (F008), cell sludge waste (D002, F008), and waste filter sludge (F008). Nonhazardous waste streams generated at the facility include dried paint scrapings waste, iron phosphate oily sludge waste, waste skimmed oil, waste zinc phosphate solution, waste zinc phosphate rinse water, waste zinc phosphate sludge, and waste nitric acid. From 1960 to 1982, the PCC facility treated waste chrome solution (D007) in the Former Chrome Solution Treatment Area (SWMU 2).

Coiled steel is spray painted at the facility. Paint-related equipment is routinely cleaned in a trough containing paint thinner. When the paint thinner (F003 and F005) is deemed unusable, it is transferred to a waste paint thinner Satellite Accumulation Area (SAA) (SWMU 1). This SWMU consists of a covered 55-gallon drum and is located adjacent to the paint area. Full drums are transferred to the Flammable Liquids Storage Shed (SWMU 8) where they are stored for less than 90 days prior to shipment. Prior to 1965, when drums became full they were received at the point of generation for off-site disposal. PCC generates about 24 drums of waste paint thinner per year. Waste paint thinner is manifested and transported by either Hukill Chemical Corporation (Hukill) or Safety-Kleen Corporation (Safety-Kleen) to Hukill or Safety-Kleen for fuel blending.

Rags saturated with MEK are used to clean painting equipment and associated tools. Waste paint rags (D035) are placed in the waste paint rags SAA (SWMU 1). This SWMU consists of a covered 55-gallon drum and is located adjacent to the paint area. Full drums are transferred to the Flammable Liquids Storage Shed (SWMU 8) where they are stored for less than 90 days prior to shipment. Prior to 1965, when drums became full, they were received at the point of generation for off-site disposal. PCC generates about four drums of waste paint rags per year. Waste paint rags are manifested and transported by Hukill to Hukill for fuel blending.

Unused or off-specification paint is periodically generated during painting activities. Small amounts of waste scrap paint (D007, D008, F003), typically less than one pint, are placed in the waste paint thinner SAA (SWMU 1). Larger amounts of waste scrap paint (D007, D008, F003) are placed in the waste scrap paint SAA (SWMU 1). The waste scrap paint SAA (SWMU 1)

consists of a covered 55-gallon drum and is located adjacent to the paint area. Full drums are transferred to the Flammable Liquids Storage Shed (SWMU 8) where they are stored for less than 90 days prior to shipment. Prior to 1965, when drums became full, they were received at the point of generation for off-site disposal. PCC generates about four drums of waste scrap paint per year. Waste scrap paint is manifested and transported by either Hukill or Safety-Kleen to Hukill or Safety-Kleen for fuel blending.

As part of pretreatment for painting and for corrosion protection, coiled steel is submerged in a 500-gallon immersion tank containing a chrome solution, which is a mixture of chromic acid and water. When the chromic acid and water solution becomes unusable, it is pumped into 55-gallon drums. Waste chromic acid (D002, D007) is then immediately transferred to a 1,000-gallon steel tank located in a diked area in the Storage Building (SWMU 9) where it is stored for less than 90 days prior to shipment. PCC generates about 3,000 gallons of waste chromic acid per year. Waste chromic acid is manifested and transported by Clean Harbors of Cleveland (Clean Harbors) to Clean Harbors of Cleveland, Ohio, for treatment. Prior to 1982, waste chromic acid was treated at the Former Waste Chrome Solution Treatment Area (SWMU 2).

Chromic acid sludge is accumulated in the 500-gallon immersion tank. Waste chromic acid sludge (D007) is transferred to a waste chromic acid sludge SAA (SWMU 1). This SWMU consists of a covered 55-gallon drum and is located adjacent to the chrome plating immersion tank. Full drums are transferred to the diked area in the Storage Building (SWMU 9) where they are stored for less than 90 days prior to shipment. PCC generates about five drums of waste chromic acid sludge per year. Waste chromic acid sludge is manifested and transported by Laidlaw Environmental Services (Laidlaw) to Clean Harbors, Inc. (Clean Harbors) of Braintree, Massachusetts, for stabilization. Prior to 1989, waste chromic acid and waste chromic acid sludge were accumulated adjacent to the chrome plating area prior to shipment to off-site facilities for disposal.

Selected coiled steel is pretreated for painting and corrosion protection in a dry plating process. This process consists of using rubber-coated rollers to apply Keylite^m material to coiled steel. Excess Keylite^m (D007) is removed from the rollers, placed in 55-gallon drums and mixed with waste chromic acid in the 1,000-gallon steel tank in the diked area in the Storage Building (SWMU 9). Waste Keylite^m is manifested and transported by Clean Harbors to Clean Harbors of Cleveland, Ohio, for treatment.

Chrome plating equipment and floor surfaces near chrome plating equipment are routinely cleaned. Chrome-contaminated debris from chrome plating equipment and floor sweepings, called waste chrome flakes (D007), are deposited in the waste chrome flakes SAA (SWMU 1). This SWMU consists of a covered 55-gallon drum and is located adjacent to the chrome plating area along the west wall of the main building. Full drums are transferred to the diked area in the Storage Building (SWMU 9) where they are stored for less than 90 days prior to shipment. PCC generates about five drums of waste chrome flakes per year. Waste chrome flakes are manifested and transported by Laidlaw to Clean Harbors of Braintree, Massachusetts, for stabilization.

During chrome plating activities, rubber-covered rollers are used to remove excess chromic acid solution from coiled steel surfaces. When the rubber covers become unusable, they are removed and transferred to a roll grinding unit where they are ground into a fine particulate. Dust generated during roll grinding activities is directed to a 55-gallon drum at the base of a Roll Grindings Dust Collector (SWMU 12) located in the northwest corner of the main building. Full drums containing roll grindings dust (D007) are transferred to the diked area in the Storage Building (SWMU 9) where they are stored for less than 90 days prior to shipment. PCC generates about 15 55-gallon drums of roll grindings dust per year. Roll grindings dust is manifested and transported by Clean Harbors or Laidlaw to either Clean Harbors of Braintree, Massachusetts, or Laidlaw of Greenbriar, Tennessee, for stabilization.

Coiled steel electrogalvanization is a process where coiled steel is immersed in a series of 20 tanks, or cells. Each cell contains a solution of sodium cyanide, sodium hydroxide, zinc, and water. The coiled steel strip is oven dried before immersion in each cell. Zinc adheres electrostatically to the coiled steel surface. The electrogalvanizing solution becomes unusable when sodium carbonate in solution begins to impede electrogalvanizing efficiency. The PCC facility employs two methods to remove sodium carbonate from the electrogalvanizing solution. Unusable electrogalvanizing solution is put into a 1,200-gallon steel tank and chilled to approximately 50 degrees Fahrenheit (°F) for two to three days. Sodium carbonate crystals are precipitated and removed from the chiller tank, while the electrogalvanizing solution is returned to the electrogalvanizing cells in a closed-loop system. Waste sodium carbonate crystals (D002, F008) are transferred to a Sodium Carbonate Crystal Tray (SWMU 3). This SWMU consists of a 270-cubic-foot metal tray open on one end and is located above the electrogalvanizing line in the northwest corner of the main building. When dry, waste sodium carbonate crystals are transferred into 55-gallon drums and transferred to the Storage Building (SWMU 9) where they are stored for less than 90 days prior to shipment. Prior to 1989, 55-gallon drums containing waste sodium

carbonate crystals were accumulated in the Former Container Accumulation Area (SWMU 10), located in the northeast corner of the main building. PCC generates about 155 55-gallon drums of waste sodium carbonate crystals per year. Waste sodium carbonate crystals are manifested and transported by Laidlaw to either Clean Harbors in Baltimore, Maryland; EcoFlo, Inc. (EcoFlo) in Greensboro, North Carolina; or Laidlaw in Greenbrier, Tennessee, for stabilization.

Method two consists of pumping unusable electrogalvanizing solution into a 1,200-gallon mixing tank located adjacent to the chiller tank. Calcium hydroxide is added to the electrogalvanizing solution to induce a reaction. A mixture of solid calcium carbonate crystals and liquid sodium hydroxide is produced and directed to a filter press. Waste calcium carbonate filter cake (F008) is emptied into a hopper directly underneath the filter press unit. Liquid sodium hydroxide is returned to the electrogalvanizing cells in a closed-loop system. Full hoppers are emptied into one-cubic-yard plastic-lined cardboard boxes located in the Waste Filter Cake and Miscellaneous Floor Sweeping Accumulation Area (SWMU 4) located in the north end of the main building. Full one-cubic-yard plastic-lined boxes containing waste calcium carbonate filter cake are transferred to the Storage Building (SWMU 9) where they are stored for less than 90 days prior to shipment. Prior to 1989, 55-gallon drums containing waste calcium carbonate filter cake (F008) were accumulated in the Former Container Accumulation Area (SWMU 10), located in the northeast corner of the main building. PCC generates about 44,844 pounds of waste calcium carbonate filter cake per year. Waste calcium carbonate filter cake is manifested and transported by Laidlaw to Laidlaw in Greenbrier, North Carolina, for stabilization.

Electrogalvanizing equipment, as well as floor areas near electrogalvanizing areas, are routinely maintained. Miscellaneous housekeeping wastes (F008), including floor sweepings, wooden pallets, and deteriorated rubber hoses used to transfer electrogalvanizing solution, are generated when electrogalvanizing equipment and floor areas near the electrogalvanizing line are cleaned. Miscellaneous housekeeping wastes (F008) are accumulated in the miscellaneous housekeeping wastes SAAs (SWMU 1). This SWMU consists of five covered 55-gallon drums and is located in various areas near the electrogalvanizing line. Full drums are either emptied into one-cubic-yard plastic-lined cardboard boxes located in the Waste Filter Cake and Miscellaneous Floor Sweepings Accumulation Area (SWMU 4) or are transferred directly to the Storage Building (SWMU 9), where they are stored for less than 90 days prior to shipment. The one-cubic-yard plastic-lined cardboard boxes in SWMU 4 containing miscellaneous housekeeping wastes are transferred to the Storage Building (SWMU 9) where they are stored for less than 90 days prior to shipment. Prior to 1989, 55-gallon drums containing miscellaneous housekeeping waste were

accumulated in the Former Container Accumulation Area (SWMU 10), located in the northeast corner of the main building. PCC generates about seven cubic yards of miscellaneous housekeeping waste per year. Miscellaneous housekeeping waste is manifested and transported by Clean Harbors to Clean Harbors in Baltimore, Maryland, for stabilization.

The PCC facility uses 20 plating cells containing electrogalvanizing solution during coiled steel electrogalvanizing activities. During routine equipment maintenance activities, four cells at a time are taken out of service for cleaning and repairs. Cell sludge waste (D002, F008) from the cells is removed and placed into the cell sludge waste SAA (SWMU 1). This SWMU consists of a covered 55-gallon drum and is located immediately east of the electrogalvanizing area. Full drums are transferred to the Storage Building (SWMU 9) where they are stored for less than 90 days prior to shipment. Prior to 1989, 55-gallon drums containing cell sludge waste were accumulated in the Former Container Accumulation Area (SWMU 10), located in the northeast corner of the main building. PCC generates about 35 55-gallon drums of waste cell sludge per year. Cell sludge waste is manifested and transported by EcoFlo to either Clean Harbors in Baltimore, Maryland; EcoFlo in Greensboro, North Carolina, or Laidlaw in Greenbrier, Tennessee, for treatment.

Electrogalvanizing solution is filtered on a continual basis. Waste filter sludge (F008) is generated when the continuous filter unit is cleaned. Waste filter sludge is accumulated in the waste filter sludge SAA (SWMU 1). This SWMU consists of a covered 55-gallon drum and is located adjacent to the continuous filter unit above the electrogalvanizing line in the northwest corner of the main building. Full drums are transferred to the Storage Building (SWMU 9) where they are stored for less than 90 days prior to shipment. Before 1989, full drums of waste filter sludge (F008) were transferred to the Former Container Accumulation Area (SWMU 10). PCC generates about 75 55-gallon drums of waste filter sludge per year. Waste filter sludge is manifested and transported by either Clean Harbors or Laidlaw to either Clean Harbors in Baltimore, Maryland, or Laidlaw in Greenbrier, Tennessee, for treatment.

Dried paint on painting equipment and floor surfaces in the paint area is removed during routine housekeeping activities. Nonhazardous dried paint waste is accumulated in a covered 55-gallon drum located in the Flammable Liquids Storage Shed (SWMU 8) prior to shipment. Prior to 1965, dried paint waste was accumulated in 55-gallon drums in the paint area; full drums were then transported off site for disposal. PCC generates about four 55-gallon drums of dried paint waste per year. Dried paint waste is manifested and transported by Safety-Kleen to Safety-Kleen for fuel blending.

During coiled steel cleaning activities, oily sludge accumulates in the bottom of the cleaning tank. Nonhazardous iron phosphate oily sludge waste is removed from the cleaning tank during routine maintenance activities. Iron phosphate oily sludge waste is accumulated in the iron phosphate oily sludge SAA (SWMU 1). This SWMU consists of a covered 55-gallon drum and is located just east of the coiled steel cleaning area in the southwest corner of the main building. Full drums are transferred to the Main Building Nonhazardous Waste Accumulation Area (SWMU 11) located in the northwest corner of the main building. PCC generates about ten drums of iron phosphate oily sludge waste per year. Iron phosphate oily sludge waste is manifested, transported, and received by Laidlaw in Greenbrier, Tennessee, for treatment.

Prior to electrogalvanizing and chrome plating, coiled steel is cleaned in a cleaning tank containing a solution of iron phosphate and water. Oil from the coiled steel surface is skimmed from the iron phosphate solution and pumped into one of three Waste Skimmed Oil Tanks (SWMU 5). This SWMU consists of three 1,000-gallon aboveground steel tanks located just east of the coiled steel cleaning area in the southwest corner of the main building. PCC generates about 8,500 gallons of waste skimmed oil per year. Waste skimmed oil is manifested and transported by Safety-Kleen to Safety-Kleen in Youngstown, Ohio, for fuel blending.

Prior to painting, coiled steel is pretreated in a tank containing a solution of zinc phosphate and water and then rinsed in an adjoining tank. When the facility determines that the zinc phosphate solution has become unusable, it is pumped into a Waste Zinc Phosphate Solution and Rinse Water Tank Area (SWMU 6). This SWMU consists of two 1,000-gallon aboveground steel tanks located adjacent to the zinc phosphating immersion and rinse tanks. During the VSI, facility representatives stated that waste zinc phosphate solution is mixed with waste zinc phosphate rinse water at this unit. PCC generates about 2,000 gallons of waste zinc phosphate solution per year. Waste zinc phosphate solution is manifested and transported by Clean Harbors to Clean Harbors in Cleveland, Ohio, for treatment.

Zinc phosphate rinse water is generated when coiled steel is rinsed in a zinc phosphate rinsing tank following zinc phosphate paint pretreatment. Zinc phosphate rinse water is transferred weekly into the Waste Zinc Phosphate Solution and Rinse water Tank Area (SWMU 6). This SWMU consists of two 1,000-gallon aboveground steel tanks located adjacent to the zinc phosphate immersion and rinse tanks. Since the facility generates zinc phosphate rinse water on a regular basis and in greater quantities, the tanks normally manage zinc phosphate rinse water. Full tanks are transferred to the Waste Zinc Phosphate Solution and Rinse water Tank Staging

Area (SWMU 7) where they are stored for less than 90 days prior to shipment. PCC generates about 16,000 gallons of waste zinc phosphate rinse water per year. Waste zinc phosphate rinse water is manifested and transported by Clean Harbors to Clean Harbors in Cleveland, Ohio, for treatment.

Zinc phosphate sludge is generated during coiled steel rinsing activities and accumulates at the bottom of the zinc phosphate rinsing tank. Waste zinc phosphate sludge is generated when the zinc phosphate rinsing tank is cleaned annually. Waste zinc phosphate sludge is transferred to the waste zinc phosphate sludge SAA (SWMU 1). This SWMU consists of a covered 55-gallon drum located adjacent to the zinc phosphate rinsing tank. Full drums are transferred to the Main Building Nonhazardous Waste Accumulation Area (SWMU 11) where they are stored for less than 90 days prior to shipment. PCC generates about four drums of waste zinc phosphate sludge per year. Waste zinc phosphate sludge is manifested and transported by Clean Harbors to Clean Harbors in Cleveland, Ohio, for treatment.

Following chrome plating, coiled steel is immersed in nitric acid solution, which is 98 percent water and 2 percent nitric acid. When the nitric acid solution is spent, it is transferred to the Waste Zinc Phosphate Solution and Rinse Water Accumulation Tank Area (SWMU 6). During the VSI, facility representatives stated that nitric acid solution is removed from the nitric acid solution tank once a year. PCC generates about 5,000 gallons of waste nitric acid solution per year. Waste nitric acid solution is manifested and transported by Clean Harbors to Clean Harbors in Cleveland, Ohio, for disposal.

From before 1960 until 1982, the PCC facility treated waste chrome solution in the Former Waste Chrome Solution Treatment Area (SWMU 2). This SWMU consisted of a 500-gallon holding tank, a 1,000-gallon portable accumulation tank, and a 1,000-gallon treatment tank. Pumps directed waste chrome solution through a series of tanks for chemical treatment. The treatment series included adding caustic to elevate the pH of the waste chrome solution, then adding chlorine gas until residual chlorine is present in the waste chrome solution. In 1982, waste chrome solution treatment activities were discontinued. Photograph No. 3 in Attachment B shows the location of the Former Waste Chrome Solution Treatment Area (SWMU 2). The location of this unit was described in the facility's Part A permit application, and shown to PRC by facility representatives during the VSI. However, on December 14, 1992, PCC contacted PRC and stated that the Former Waste Chrome Solution Treatment Area (SWMU 2) was in a location not shown to

PRC during the VSI. PCC stated that this unit is located indoors about 25 feet north of the waste chrome flakes SAA (SWMU 1) along the west wall of the facility.

2.4 HISTORY OF DOCUMENTED RELEASES

No releases to ground water, surface water, air, and on-site soils from the PCC facility have been documented.

2.5 REGULATORY HISTORY

The PCC facility submitted a Notification of Hazardous Waste Activity form to EPA on August 26, 1980 [Pittsburgh-Canfield Corporation (PCC), 1980a]. The PCC facility submitted a RCRA Part A permit application on November 17, 1980 (PCC, 1980b). This application listed process codes for tank treatment (T01) of F007 waste at the Former Waste Chrome Solution Treatment Area (SWMU 2).

On December 16, 1981, the Ohio Hazardous Waste Facility Approval Board issued a hazardous waste facility installation and operation permit to the PCC facility (Permit No. 02-50-0336) (Ohio Hazardous Waste Approval Board, 1981). On February 17, 1982, the PCC facility submitted a revised RCRA Part A permit application to change the waste code designation for waste chrome solution from F007 to D007 (PCC, 1982a). On September 28, 1982, the PCC facility sent a letter to the Ohio Environmental Protection Agency (OEPA) stating that treatment of waste chrome solution had been discontinued and that the hazardous waste facility installation and operation permit was no longer necessary (PCC, 1982b). In a letter dated March 8, 1983, OEPA stated that a Notice of Withdrawal of the Hazardous Waste Facility Installation and Operation Permit, as well as the closure plan, should be submitted to OEPA and EPA (OEPA, 1983b). In a letter dated April 8, 1983, PCC stated that the former waste chrome solution treatment area will not be closed; rather, the area would be used for less than 90-day storage of waste chrome solution prior to shipment off site at source. On August 23, 1983, WPC stated that the PCC facility no longer requires Hazardous Waste Facility Permit No. 02-50-0336 (WPC, 1983).

In a letter dated March 31, 1986, EPA stated that the PCC facility is subject to closure requirements outlined in 40 CFR 265 Subpart G (EPA, 1986). EPA stated that PCC's obligations under 40 CFR Subpart G may be satisfied by completing a Request for Change in Status form and that EPA will notify PCC in writing of the facility's regulatory status. On May 9, 1986, WPC

submitted a completed Request for Change in Status form for the PCC facility (WPC, 1986). During a review of EPA and OEPA files, PRC was unable to locate a EPA written determination of the PCC facility's regulatory status.

On January 22, 1991, the PCC facility submitted a Notification of Regulated Waste Activity (PCC, 1991). This notification listed D002, D000, D007, D008, D035, F003, F005, and F008 wastes.

The PCC facility is currently operating as a large-quantity generator storing hazardous waste for less than 90 days. OEPA has not acknowledged the facility's status in writing.

In the past, PCC had several RCRA compliance problems. The violations were observed during a series of Ohio Environmental Protection Agency (OEPA) inspections that took place from 1981 to 1992. These violations mainly consisted of deficiencies in paperwork, including inspection plans and logs, the contingency plan, and waste analysis plan. Other violations mainly consisted of waste management violations, including improper labeling of drums containing hazardous waste, inadequate aisle space, inadequate testing and maintenance of emergency equipment, and lack of annual training refresher courses (OEPA, 1981, 1982, 1983, and 1992).

The facility currently is not required to have operating air permits. Two natural gas fired boilers are currently on registration status with OEPA due to minimal emissions (OEPA, 1990). On May 15, 1992, PCC submitted a permit application to operate a coil coating line application unit in the paint area. According to facility representatives, this application is pending approval by OEPA (PCC, 1993). The facility has no history of odor complaints from area residents.

The PCC facility currently is not required to have a National Pollutant Discharge Elimination System (NPDES) permit. The facility is required to have a Mahoning County Pollutant Discharge Elimination System permit (permit number ME55ICA). Sanitary and noncontact cooling water is discharged to the Meander sewer system and the Publicly Owned Treatment Works. The PCC facility is required to monitor discharged wastewater for pH, temperature, biochemical oxygen demand, suspended solids, phosphates, nitrogen, phenols, metals, and oil and grease (Mahoning County Sanitary Engineering Department, 1986).

The PCC facility has never had any underground storage tanks.

There is no history of Superfund (CERCLA) activity at the site.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Mahoning County is temperate. The average daily temperature is 48 degrees Fahrenheit (°F) [U.S. Department of Commerce (USDC), 1991]. The lowest average daily temperature is 27°F in January [National Oceanic and Atmospheric Administration (NOAA), 1990]. The highest average daily temperature is 71°F in July (NOAA, 1990).

The total annual precipitation for the county is 34.25 inches. The mean annual lake evaporation for the area is about 30 inches (USDC, 1968). The 1-year, 24-hour maximum rainfall is about 2 inches (USDC, 1963).

The prevailing wind is from the south. Average wind speed is highest in January at 13 miles per hour (NOAA, 1990).

2.6.2 Flood Plain and Surface Water

The PCC facility is located in an area of minimal flooding (FEMA, 1978). The nearest surface water body is a small lake located 0.75 miles southeast of the facility which is used for recreational purposes. An unnamed intermittent drainage is located about 150 feet west of the facility. Sawmill Creek is located about 1 mile north of the facility. Sawmill Creek discharges into Meander Creek Reservoir, located about 3.25 miles northwest of the PCC facility. The City of Youngstown, Ohio, supplies Canfield with drinking and municipal water. Youngstown uses the Meander Creek Reservoir as a source of drinking water.

The ground surface at the PCC facility is level. Surface water runoff is directed to a low-lying area on the east side of the facility. This water then percolates into the ground or evaporates.

2.6.3 Geology and Soils

Mahoning County is located in northeast Ohio, within the glaciated portion of the Allegheny Plateau. The county is characterized by glacial deposits underlain by sedimentary Paleozoic Age bedrock. The glacial deposits of the area consist of sand, silt, gravel, and clay. The topography of the area is composed of glacial features produced by a series of advances and retreats of Wisconsin-aged glaciers. Glacial features include outwash plains and channels, and lake and till plains at a low elevation. Surface soils at the facility generally consist of moderately to well drained silty to clayey loam and poorly drained clayey loams (USDA, 1971).

The Paleozoic bedrock of the area consists of the Cuyahoga, Pennsylvania, Allegheny, and Pottsville formations of Mississippian and Pennsylvanian ages. The Pennsylvania, Allegheny, and Pottsville formations consist of alternating layers of shale, sandstone, limestone, and coal. The oldest bedrock in the county is the Mississippian-age Cuyahoga formation which consists of shale and sandstone. Bedrock in Cuyahoga County is mantled everywhere by glacial deposits, and natural exposures are limited to stream valleys and steep hillsides where the overlying unconsolidated glacial deposits have been eroded.

2.6.4 Ground Water

No hydrogeologic characterization of the PCC facility is available. Ground water in the county can be obtained in moderate-to-large quantities from two contrasting aquifers: the sandstone bedrock and the unconsolidated glacial sand and gravel deposits. Glacial deposits, particularly sand and gravel, are important aquifers where they have sufficient extent and thickness. Areas with the greatest potential yield of ground water are the preglacial and interglacial channels, which are now wholly or partially filled with glaciofluvial deposits of varying thickness. A small area where the potential for sustained ground-water yields of 200 or more gallons per minute is possible in a portion of the valley of Crab Creek in northeast Youngstown north of the Mahoning River, where the aquifer is Pennsylvanian sandstone overlain by thick sand and gravel (Totten and White, 1987). Ground water is not used as a source for drinking water in Mahoning County.

2.7 RECEPTORS

The facility occupies 9 acres in a mixed-use area in Canfield, Ohio. Canfield has a population of about 5,409.

The facility is bordered on the north by undeveloped land and railroad tracks, on the west by a small commercial business, on the south by Route 224 and undeveloped land, and on the east by the Standard Slag Company and railroad tracks. The nearest school is located about 0.25 mile northeast of the facility. The nearest residence is located about 400 feet west of the facility.

The nearest surface water body is a small lake located 0.75 mile southeast of the facility which is used for recreational purposes. Other surface water bodies in the area include Sawmill Creek, located about 1 mile north of the facility and an unnamed intermittent drainage, located about 150 feet west of the facility.

Access to the facility is limited by a fence surrounding the active portions of the facility and 24-hour electronic security.

Surface water is used as a source of municipal and drinking water. The City of Canfield receives its drinking water from Youngstown. Youngstown uses the Meander Reservoir as a source of water (Canfield, 1993).

Sensitive environments are not located on site. The nearest sensitive environment is a wetland area located about 600 feet south of the facility. Other sensitive environments include wetland areas located 0.6 mile southeast and 1.75 miles northwest of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 12 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Satellite Accumulation Areas (SAA)

Unit Description:

This unit consists of 15 55-gallon containers used to accumulate hazardous and nonhazardous wastes at the point of generation. A waste paint thinner SAA, waste paint rags SAA, and a waste scrap paint SAA are located adjacent to the paint area. A waste chromic acid sludge SAA is located adjacent to the chrome plating immersion tank. A waste chrome flakes SAA is located adjacent to the chrome plating area along the west wall of the main building. Five miscellaneous housekeeping wastes SAAs are located at various locations along the electrogalvanizing line. A waste cell sludge SAA is located immediately east of the chrome plating cells area. A waste filter sludge SAA is located adjacent to the continuous filter unit above the cell sludge area. A waste iron phosphate oily sludge SAA is located immediately east of the coiled steel cleaning area in the southwest corner of the main building. A waste zinc phosphate sludge SAA is located adjacent to the zinc phosphate rinsing tank. No floor drains are located near facility SAAs.

Date of Startup:

This unit began operations in the early 1960s.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages waste paint thinner (F003, F005), waste paint rags (D035), waste scrap paint (D007, D008, F003), waste chromic acid sludge (D007), waste chrome flakes (D007), miscellaneous housekeeping waste (F008), cell sludge waste (D002, F008), waste

Date of Startup:

This unit began operation in the mid-1950s.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages nonhazardous waste skimmed oil.

Release Controls:

This unit does not have secondary containment. This unit is located indoors on a concrete surface. Nonhazardous waste skimmed oil is accumulated in closed 1,000-gallon aboveground steel tanks.

History of

Documented Releases:

No releases from this unit have been documented.

Observations:

PRC was unable to determine the amount of waste skimmed oil in the unit during the VSI. PRC noted no evidence of release (see Photograph No. 6).

SWMU 6

Waste Zinc Phosphate Solution and Rinse Water Tank Area

Unit Description:

This unit consists of two 1,000-gallon aboveground steel tank located adjacent to the zinc phosphating immersion and rinse tanks. Spent zinc phosphate solution, which is a mixture of zinc phosphate and water, is generated during coiled steel paint pretreatment operations and is pumped into a 1,000-gallon aboveground steel tank. In addition, the rinse water used to rinse steel after dipping in the zinc phosphate solution is pumped weekly into a 1,000-gallon steel tank at this unit. Waste zinc phosphate solution is mixed with waste zinc phosphate rinse water at this unit. Since zinc phosphate rinse water is generated routinely and in greater quantities, more tanks are designated to accumulate zinc phosphate rinse water. No floor drains are located near this unit.

Date of Startup:

This unit began operation in the mid-1950s.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages nonhazardous waste zinc phosphate solution and

zinc phosphate solution rinse water.

Release Controls:

This unit does not have secondary containment. Waste zinc phosphate solution and rinse water are accumulated in closed

1,000-gallon above-ground steel tanks.

History of

Documented Releases:

No releases from this unit have been documented.

Observations:

The unit consists of two 1,000-gallon aboveground steel tanks containing waste zinc phosphate rinse water. However, PRC was unable to determine the amount of waste zinc phosphate rinse water in each 1,000-gallon steel tank during the VSI. PRC noted no evidence of release (see Photograph No. 7).

SWMU 7

Waste Zinc Phosphate Solution and Rinse Water Tank Staging Area

Unit Description:

This unit consists of a 25-foot by 10-foot concrete pad located in the northwest corner of the main building. This unit is used to store full 1,000-gallon steel tanks containing waste zinc phosphate rinse water and zinc phosphate solution. Waste zinc phosphate rinse water and waste zinc phosphate solution is pumped from the waste zinc phosphate rinse water tanks directly into tanker trucks for treatment off site. No floor drains are located near this unit.

Date of Startup:

This unit began operation in the mid-1950s.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages nonhazardous waste zinc phosphate solution and waste zinc phosphate rinse water.

29

Release Controls:

This unit does not have secondary containment. Full 1,000-gallon steel tanks containing waste zinc phosphate rinse water are stored indoors on concrete floors and are completely sealed.

History of

Documented Releases:

No releases from this unit have been documented.

Observations:

During the VSI, the unit contained four full 1,000-gallon steel tanks containing waste zinc phosphate rinse water. PRC noted no evidence of release (see Photograph No. 8).

SWMU 8

Flammable Liquids Storage Shed

Unit Description:

This unit consists of a 625-square-foot corrugated steel shed with a diked concrete floor located north of the main building. This unit is used for less than 90-day storage of hazardous waste paint thinner, hazardous waste paint rags, and hazardous waste scrap paint, generated during coiled-steel painting operations. This unit is also used to store paint thinner product. No floor drains are located near this unit.

Date of Startup:

This unit began operation in 1980.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages waste paint thinner (F003, F005), waste paint rags (D035), waste scrap paint (D007, D008, F003), and nonhazardous dried paint scrapings waste.

Release Controls:

This unit does not have complete secondary containment. This unit has a 6-inch concrete dike at the entrance on the west side only.

History of

Documented Releases:

No releases from this unit have been documented.

Observations:

During the VSI, the unit contained four full 55-gallon drums of hazardous waste paint thinner, one full 55-gallon drum of hazardous waste paint rags, six empty 55-gallon drums, and five 55-gallon drums containing paint thinner product. PRC noted some areas of floor staining and several holes along the base of the south wall of the Flammable Liquids Storage Shed (SWMU 8) (see Photograph No. 9).

SWMU 9

Storage Building

Unit Description:

This unit consists of a 6,000-square-foot corrugated metal and cinderblock building located north of the main building. This unit is used to store hazardous waste for less than 90 days, as well as unused equipment. A 20-foot by 15-foot diked concrete pad is located in the northeast corner of the Storage Building (SWMU 9) and is used to store hazardous chrome-bearing wastes for less than 90 days. No floor drains are located in or near this unit.

Date of Startup:

This unit began operation in 1989.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages waste chromic acid (D002, D007), waste chromic acid sludge (D007), waste Keylite^m (D007), roll grindings dust (D007), waste chrome flakes (D007), waste sodium carbonate crystals (D002, F008), waste calcium carbonate filter cake (F008), miscellaneous housekeeping wastes (F008), cell sludge waste (D002, F008), and waste filter sludge (F008).

Release Controls:

This unit does not have complete secondary containment. A 20-foot by 15-foot diked concrete area is located in the northeast corner of the unit. Secondary containment is not present along the walls of the Storage Building (SWMU 9).

History of

Documented Releases:

No releases from this unit have been documented.

Observations:

During the VSI, the 20-foot by 15-foot diked area contained about 1,000 gallons of hazardous waste chromic acid, two full 55-gallon drums of hazardous waste chrome flakes, and one full 55-gallon drum of hazardous waste chromic acid sludge. A 60-foot by 30-foot area contained about 80 full drums hazardous sodium carbonate crystal waste, hazardous cell sludge waste, and hazardous waste filter sludge. The 60-foot by 30-foot area in this unit also contained five full one-cubic-yard cardboard boxes of hazardous waste calcium carbonate filter cake and two full one-cubic-yard cardboard boxes of hazardous miscellaneous housekeeping wastes. PRC noted no evidence of release (see Photographs No. 10 and 11).

SWMU 10

Former Container Accumulation Area

Unit Description:

This unit consists of a 35-foot by 20-foot concrete surface located in the northeast corner of the main building. This unit was used to store hazardous waste for less than 90 days. A metal door and a cinderblock wall border this unit on the north and east, respectively. Coiled steel and unused equipment are currently stored in this unit. No floor drains are located near this unit.

Date of Startup:

This unit began operation in 1980.

Date of Closure:

This unit has been inactive since 1989.

Wastes Managed:

This unit managed waste sodium carbonate crystals (D002, F008), waste calcium carbonate filter cake (F008), miscellaneous housekeeping wastes (F008), cell sludge wastes (D002, F008), and waste filter sludge (F008).

Release Controls:

This unit did not have secondary containment. Hazardous waste was accumulated in closed 55-gallon drums on a concrete floor.

History of

Documented Releases:

No releases from this unit have been documented.

Observations:

The unit contained coiled steel and unused equipment during the VSI. Minor oil stains were present on the concrete floor near the steel door at the north end of this unit (see Photograph No. 12).

SWMU 11

Main Building Nonhazardous Waste Accumulation Area

Unit Description:

This unit consists of a 12-foot by 15-foot enclosed area in the northwest corner of the main building. This unit is used to accumulate nonhazardous waste. No floor drains are located near this unit.

Date of Startup:

This unit began operation in 1992.

Date of Closure

This unit is active.

Wastes Managed:

This unit manages nonhazardous iron phosphate oily sludge waste and nonhazardous zinc phosphate sludge waste.

Release Controls:

This unit does not have secondary containment. Nonhazardous waste is stored in covered 55-gallon drums on a concrete surface.

History of

Documented Releases:

No releases from this unit have been documented.

Observations:

During the VSI, this unit contained three full 55-gallon drums of nonhazardous iron phosphate oily sludge waste and one full 55-gallon drum of nonhazardous zinc phosphate sludge waste. PRC noted no evidence of release (see Photograph No. 13).

SWMU 12

Roll Grindings Dust Collector

Unit Description:

This unit consists of a totally enclosed baghouse dust collection system that deposits dust into 55-gallon drums at its base. Dust is generated when rubber-covered rollers, used to remove excess chromic acid solution from coiled steel surfaces, are reduced into a fine particulate. Roll grindings dust is directed to this unit for collection. No floor drains are located near this unit.

Date of Startup:

This unit began operation in 1985.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages hazardous roll grindings dust (D007).

Release Controls:

This unit does not have secondary containment. The baghouse dust collector and 55-gallon drum operate as a totally enclosed system.

History of

Documented Releases:

No releases from this unit have been documented.

Observations:

A covered 55-gallon drum was positioned under the baghouse dust collector during the VSI. PRC noted no evidence of release (see Photograph No. 14).

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 12 SWMUs and no AOCs at the PCC facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 2

Former Waste Chrome Solution Treatment Area

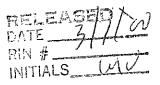
Conclusions:

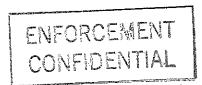
This unit does not pose a significant potential for release to the environment. The potential for release to environmental media is summarized below.

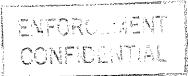
Ground Water, Surface Water, Air, and On-Site Soils: Low. The Former Waste Chrome Solution Treatment Area (SWMU 2) was located indoors on a concrete floor. This unit was a completely enclosed system which did not manage volatile organic compound (VOC)-containing waste.

Recommendations:

The Former Waste Chrome Solution Treatment Area (SWMU 2) has been inactive since 1982, but closure of the unit has not been documented. PRC recommends that RCRA closure be completed if approval of its change of status cannot be located.







| SWMU 1 | Satellite Accumulation Areas (SAA) |
|---------|---|
| SWMU 3 | Sodium Carbonate Crystal Tray |
| SWMU 4 | Waste Filter Cake and Miscellaneous Floor Sweepings Accumulation Area |
| SWMU 5 | Waste Skimmed Oil Tanks |
| SWMU 6 | Waste Zinc Phosphate Solution and Rinse Water Tank Area |
| SWMU 7 | Waste Zinc Phosphate Solution and Rinse Water Tank Staging Area |
| SWMU 8 | Flammable Liquids Storage Shed |
| SWMU 9 | Storage Building |
| SWMU 10 | Former Container Accumulation Area |
| SWMU 11 | Main Building Nonhazardous Waste Accumulation Area |
| SWMU 12 | Roll Grindings Dust Collector |

Conclusions:

These units do not pose a significant potential for release to the environment. The potential for release to environmental media is summarized below.

Ground Water, Surface Water, Air, and On-Site Soils: Low. These SWMUs are located indoors on concrete floors. Waste is managed in enclosed containers and it is unlikely that releases would leave the enclosed areas.

VOC-containing waste is accumulated in covered 55-gallon drums at the waste paint thinner, waste paint rags, and waste scrap paint SAAs (SWMU 1), and the Flammable Liquids Storage Shed (SWMU 8), thereby limiting the possibility of an air release. SWMUs 3, 4, 5, 6, 7, 9, 10, 11, and 12 do not manage VOC-containing waste.

Recommendations:

PRC recommends that waste management practices be improved near the waste paint thinners, waste paint rags, and waste scrap paint SAAs (SWMU 1) since stains were noted at these units. PRC recommends that holes along the base of the south wall of the Flammable Liquid Storage Shed (SWMU 8) be repaired. PRC recommends no further action at this time for SWMUs 3, 4, 5, 6, 7, 9, 10, 11, and 12.

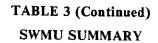
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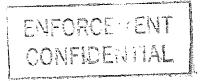
TABLE 3 SWMU SUMMARY

| _ | SWMU | Dates of Operation | Evidence of Release | Recommended Further Action |
|----|---|---|---|--|
| 1. | Satellite Accumulation Areas (SAAs) | The waste paint thinner, waste paint rags, and waste scrap paint SAAs began operation in the early 1960s. The waste chromic acid sludge SAA began operation in the early 1960s. The waste Keylite™ SAA began operation in the early 1980s. The waste chrome flakes and waste cell sludge SAAs began operation in the early 1960s. | During the VSI, PRC observed several stained areas on the concrete floors near the waste paint thinner and waste paint rags SAAs. | Waste management practices should be improved near the waste paint thinner, waste paint rags, and waste scrap paint SAAs. |
| 2. | Former Waste Chrome Solution Treatment Area | Before 1960 to 1982 | No evidence of release at the location shown to PRC during the VSI. | PRC recommends that RCRA closure be completed at this unit if approval of its change of status cannot be located. |
| 3. | Sodium Carbonate Crystal Tray | Mid-1950s to present | None | PRC recommends no further action at this time. |
| 4. | Waste Filter Cake and Miscellaneous Floor Sweepings Accumulation Area | Mid-1950s to present | None | PRC recommends no further action at this time. |
| 5. | Waste Skimmed Oil Tanks | Mid-1950s to present RELEAST DATE RIN# INITIALS | None Ship Linux | PRC recommends no further action at this time. |
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| | SWMU | Dates of Operation | Evidence of Release | RecommendedFurther Action |
|-----|---|----------------------|---|--|
| 6. | Waste Zinc Phosphate Solution and Rinse Water Tank Area | Mid-1950s to present | None | PRC recommends no further action at this time. |
| 7. | Waste Zinc Phosphate Solution and Rinse Water Tank Staging Area | Mid-1950s to present | None | PRC recommends no further action at this time. |
| 8. | Flammable Liquids Storage Shed | 1980 to present | PRC observed several stained areas during the VSI on the concrete floors. | PRC recommends that holes along the base of the south wall at this unit be repaired. |
| 9. | Storage Building | 1989 to present | None | PRC recommends no further action at this time. |
| 10. | Former Container Accumulation Area | 1980 to 1989 | During the VSI, PRC observed minor oil stains on the concrete floor. | PRC recommends no further action at this time. |
| 11. | Main Building Nonhazardous Waste Accumulation Area | 1992 to present | None | PRC recommends no further action at this time. |
| 12. | Roll Grindings Dust Collector | 1985 to present | None | PRC recommends no further action at this time. |

REFERENCES

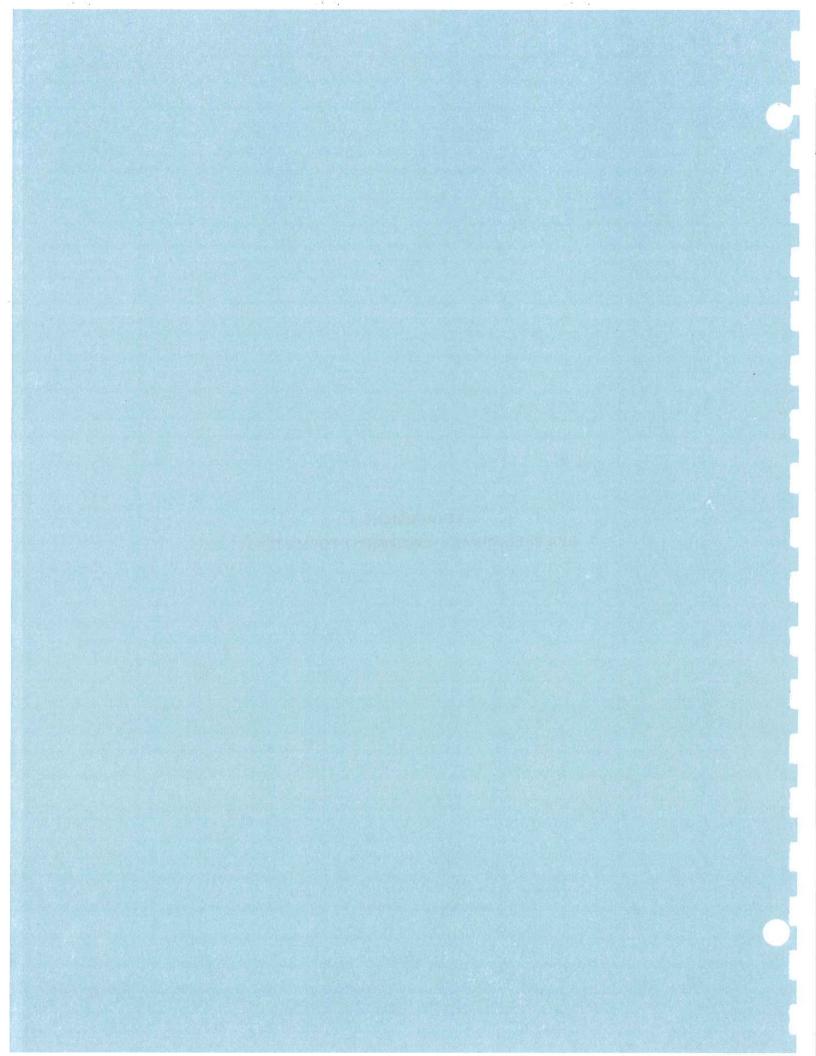
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WPC, 1986. Letter from W.R. Samples, WPC, to Y.J. Kim, EPA, May 9.

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ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12





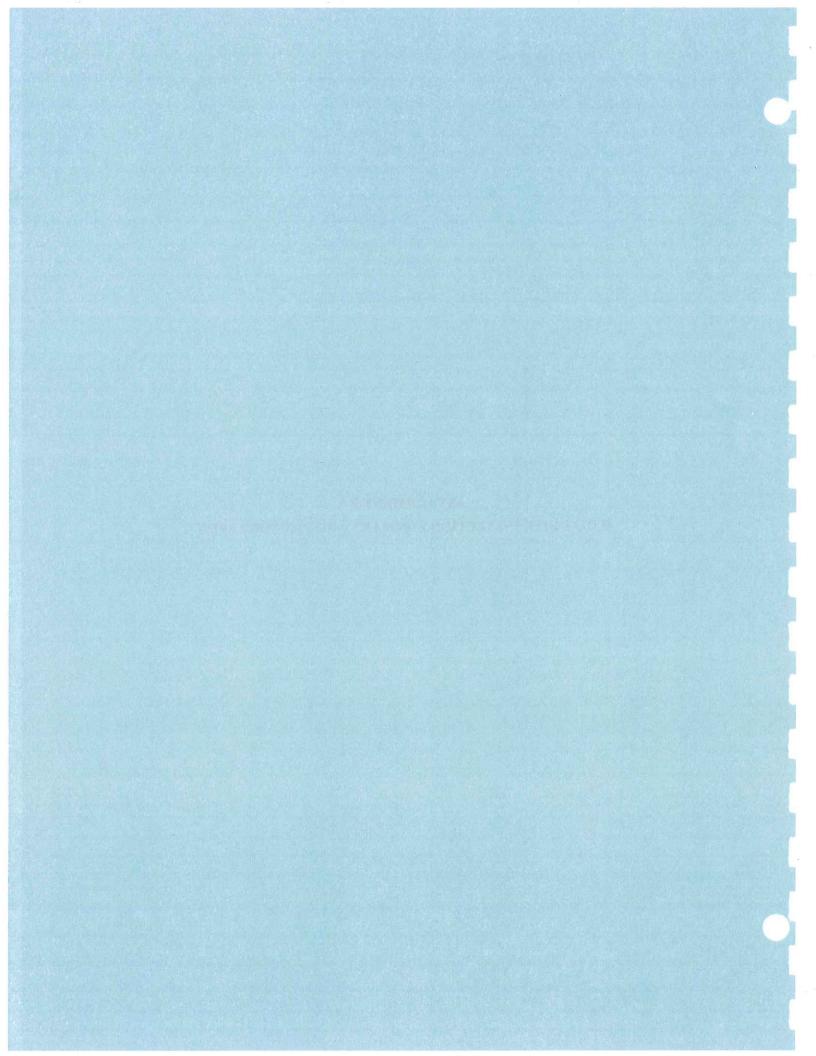
POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION AND ASSESSMENT

| I. IDENTIFICATION | | | | | | | | |
|-------------------|----------------|--|--|--|--|--|--|--|
| OI STATE | 02 SITE NUMBER | | | | | | | |
| — OH | OHD MO SIG 202 | | | | | | | |

| II. SITE NAME AND LOCATION | | | ··· | | | | |
|---|--|---|---|------------------------------------|---------------------------------------|---------------------------------------|--|
| 01 SITE NAME (Legel, common, or descriptive name Pittsburgh-Canfield Corporation | 02 STRE 460 | 02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER 460 West Main Street | | | | | |
| 03 CITY Canfield | 04 STATE OH | 05 ZIP CODE 44406 | 06 COUNTY Mahoning | 07 COUNTY CODE | 08 CONG DIST | | |
| 09 COORDINATES: LATITUDE 41° 01' 30" N | LONGITUDE 80° 47' 00" W | | <u></u> | <u> </u> | <u> </u> | | |
| 10 DIRECTIONS TO SITE (Starting from nearest put Interstate 80 East, exit State Route 11 So | olic road) uth; exit U.S. 224 Wes | st (Main Stre | ct); take Mair | Street to 460 | West Main S | Street. | |
| III. RESPONSIBLE PARTIES | | | | | | | |
| 01 OWNER (if known) Wheeling-Pittsburgh Steel Corporation | | 02 STREE 1134 | T <i>(Business, meil</i> Market Street | ing residentiel) | | | |
| 03 CITY Wheeling | | 04 STATE WV | 05 ZIP CODE 26003 | 06 TELEPHONE (304) 234 | | | |
| 07 OPERATOR (If known and different from owner) Pittsburgh-Canfield Corporation | | 08 STREE | T (Business, meil West Main Str | ing, residential) | | | |
| 09 CITY Canfield | | 10 STATE OH | 11 ZIP CODE 44406 | 12 TELEPHONE (216) 533- | | i. | |
| 13 TYPE OF OWNERSHIP (Check one) III A. PRIVATE II B. FEDERAL: (Ag II F. OTHER (Specify) 14. OWNER/OPERATOR NOTIFICATION ON FILE (Check one) III A. RCRA 3010 DATE RECEIVED: 08/26/80 MONTH DAY Y | B. UNCONTROLL | G. UNK | NOWN | . COUNTY | DE. MUNICI | PAL | |
| IV. CHARACTERIZATION OF POTENTIAL HA | <u> </u> | | | | MONTH DAY | YEAR | |
| | t all that apply) | | · | | · · · · · · · · · · · · · · · · · · · | | |
| ## YES DATE 12/02/92 D NO CONTRAC | E B. EPA CO E E. LOCAL HEALTH OF | FICIAL | C. STATE F. OTHER: | /5000 | OTHER CONTI | RACTOR | |
| 02 SITE STATUS (Check one) | 03 | YEARS OF OPE | | ic. (FRC) | | | |
| ■ A. ACTIVE II B. INACTIVE II C.U | NKNOWN | Late 1 | 1940s Present VING YEAR ENDING Y | | UNKN | iown . | |
| 04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESEN | T, KNOWN, OR ALLEGED | | | CAR | | | |
| The substances present are primarily paint paint thinner and waste paint thinner-contra | thinner product, chron minated materials, and | nic acid, nit various chr | ric acid, cyani ome and cyani | de-containing e ide bearing was | lectrogalvan ites. | izing solution, waste | |
| 05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRO No releases to the environment from solid | | | have been doo | cumented. | | | |
| V. PRIORITY ASSESSMENT | | | | | | | |
| 01 PRIORITY FOR INSPECTION (Check one. If high or) | nedium is checked, complete | Part 2 - West | e Information and | Part 3 - Dagadasia | | | |
| D A. HIGH | ■ C. LOW | | D. NONE | | | | |
| VI. INFORMATION AVAILABLE FROM | | | 11 | action needed; con | işimin current i | aisposition form) | |
| 01 CONTACT Kevin Pierard | 02 OF (Agency/Organi U.S. EPA | zation) | | | | 03 TELEPHONE NUMBER (312) 886-4448 | |
| 04 PERSON RESPONSIBLE FOR ASSESSMENT Peter Lynch | 05 AGENCY | 06 ORGA | ANIZATION PRC | 07 TELEPHONE (312) 85 | | 08 DATE 01/19/93 | |
| EPA FORM 2070-12(17-81) | | | | | | MONTH DAY YEAR | |

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ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS



VISUAL SITE INSPECTION SUMMARY

Pittsburgh-Canfield Corporation 460 West Main Street Canfield, Ohio OHD 000 810 283

Date:

December 2, 1992

Primary Facility Representative: Representative Telephone No.:

Ron Jandrokovic, Engineer

(216) 533 - 3311

Additional Facility Representatives:

Clarence Newhouse, Plant Manager

Thomas Waligura, Assistant Manager, Environmental

Control, Wheeling-Pittsburgh Corporation

Inspection Team:

Peter Lynch, PRC Environmental Management, Inc. (PRC)

Cathy Collins, PRC

Photographer:

Cathy Collins, PRC

Weather Conditions:

Cloudy, light snow, calm winds, 30°F

Summary of Activities:

The visual site inspection (VSI) began at 9:15 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour began at 1:30 p.m. PRC visited the paint area, including the waste paint thinner, waste paint rags, and waste scrap paint satellite accumulation areas (SAA) (SWMU 1). PRC then visited the coiled steel cleaning, electrogalvanizing and chrome plating areas, including the Waste Skimmed Oil Tank (SWMU 5), the waste chromic acid sludge SAA (SWMU 1), the waste cell sludge SAA (SWMU 1), the waste iron phosphate oily sludge SAA (SWMU 1), the waste zinc phosphate sludge SAA (SWMU 1), the waste filter sludge SAA (SWMU 1), and the miscellaneous housekeeping wastes SAAs (SWMU 1). Facility representatives then showed PRC the Former Waste Chrome Solution Treatment Area (SWMU 2), the Sodium Carbonate Crystal Tray (SWMU 3), the Waste Filter Cake and Miscellaneous Floor Sweepings Accumulation Area (SWMU 4), the Waste Zinc Phosphate Rinse Water Tank Staging Area (SWMU 7), the Roll Grindings Dust Collector (SWMU 12), the Main Building Nonhazardous Waste Accumulation Area (SWMU 11), and the Former Container

Accumulation Area (SWMU 10). PRC then visited the Flammable Liquids Storage Shed (SWMU 8) and the Storage Building (SWMU 9). PRC then visited the Waste Zinc Phosphate Solution and Rinse Water Tank Area (SWMU 6), the Waste Zinc Phosphate Sludge SAA (SWMU 1), and the Waste Chrome Flakes SAA (SWMU 1).

The tour concluded at 3:40 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 4:00 p.m.



Photograph No. 1 Location: SWMU 1
Orientation: North Location: SWMU 1
Date: 12/02/92

Description: The waste paint thinner SAA consists of a covered 55-gallon drum. A trough containing paint thinner is in the background. Note numerous stains on the

55-gallon drum, walls, and floor.



Photograph No. 2 Location: SWMU 1
Orientation: Northwest Date: 12/02/92

Description: The 55-gallon drum on the left is the waste chrome flakes SAA (SWMU 1). Note

the hazardous waste label affixed to the 55-gallon drum. The drum on the right

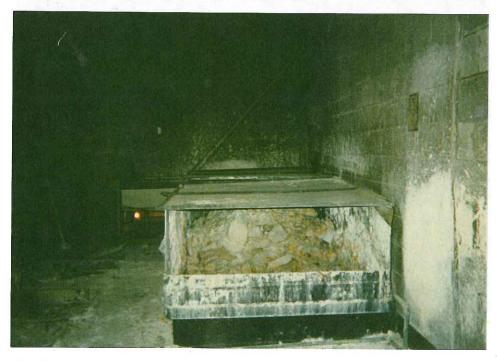
contains emergency spill containment equipment.



Photograph No. 3 Location: SWMU 2
Orientation: Southwest Date: 12/02/92

Description: This photograph shows the location of the Former Waste Chrome Solution

Treatment Area (SWMU 2) as described by facility representatives during the VSI. The tank in the foreground is the 1,200-gallon calcium hydroxide mixing tank. The tank in the background is the 1,200-gallon sodium hydroxide chiller tank.



Photograph No. 4 Location: SWMU 3
Orientation: North Date: 12/02/92

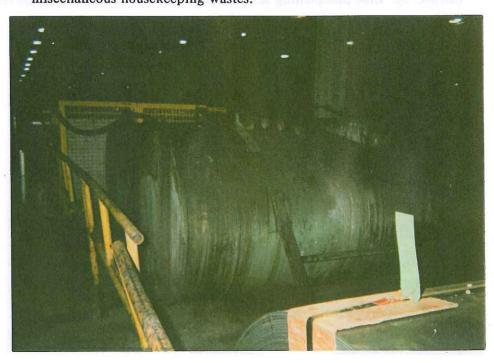
Description: The Sodium Carbonate Crystal Tray (SWMU 3) is a 15-foot by 6-foot by 3-foot

metal tray open on one end.



Photograph No. 5 Orientation: Southwest

Description: Plastic-covered boxes in center of photograph contain hazardous waste calcium carbonate filter cake. Three 55-gallon drums to the left contain hazardous miscellaneous housekeeping wastes.



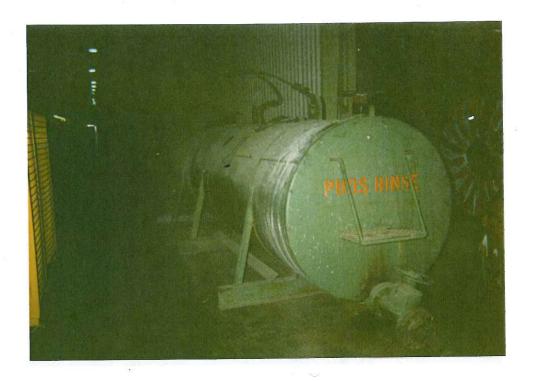
Photograph No. 6 Orientation: Northeast Location: SWMU 5 Date: 12/02/92

Location: SWMU 4

Date: 12/02/92

Description: Nonhazardous waste skimmed oil is accumulated in two 1,000-gallon steel tanks.

Coiled steel is in the foreground.



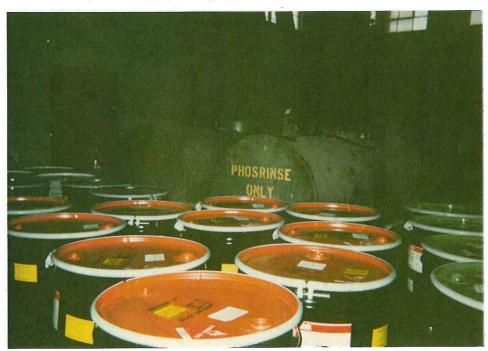
Photograph No. 7 Orientation: Northeast

Description:

ortheast

Date: 12/02/92
Waste zinc phosphate solution and rinse water is accumulated in two 1,000-gallon

steel tanks in the Waste Zinc Phosphate Solution and Rinse Water Tank Area (SWMU 6). Zinc phosphating solution and rinse water tanks are to the left.



Photograph No. 8 Orientation: Northwest Location: SWMU 7 Date: 12/02/92

Location: SWMU 6

Description:

The two 1,000-gallon steel tanks in the background contain waste zinc phosphate rinse water and are located in the Waste Zinc Phosphate Solution and Rinse Water Tank Staging Area (SWMU 7). Fifty-five gallon drums in the foreground contain alkaline cleaner product.



Photograph No. 9
Orientation: North

Location: SWMU 8
Date: 12/02/92

Description:

Fifty-five gallon drums in the background of this photograph contain hazardous waste paint thinner. The 55-gallon drum in the foreground contains hazardous waste paint rags. All five 55-gallon drums are stored in the Flammable Liquids Storage Shed (SWMU 8).



Photograph No. 10

Orientation: Northeast

Location: SWMU 9

Date: 12/02/92

Description: Hazardous waste chromic acid and hazardous waste Keylite™ are mixed and stored

in a 1,000-gallon steel tank located in a diked area in the northeast corner of the

Storage Building (SWMU 9).



Photograph No. 11

Orientation: Southeast

Description:

The 55-gallon drums on the left side of this photograph contain hazardous sodium carbonate crystal waste, hazardous cell sludge waste, and hazardous waste filter sludge. Cardboard boxes on the right contain hazardous waste calcium carbonate filter cake and hazardous miscellaneous housekeeping wastes.

Location: SWMU 9

Location: SWMU 10

Date: 12/02/92



Photograph No. 12

Orientation: East

Description:

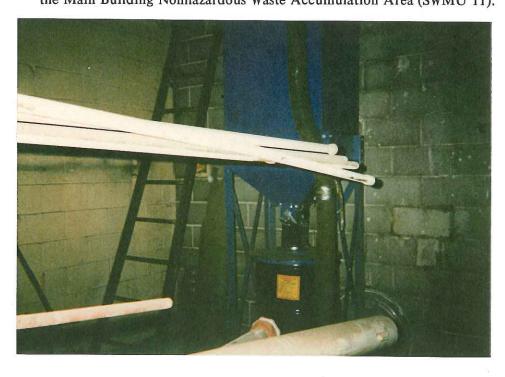
The Former Container Accumulation Area (SWMU 10) was located in the northeast corner of the main building. A metal door is on the left side of this photograph. Coiled steel is on the right side. Note minor oil staining in bottom of photograph.



Photograph No. 13 Orientation: West

Location: SWMU 11 Date: 12/02/92 Description: Three 55-gallon drums of nonhazardous iron phosphate oily sludge waste and one

55-gallon drum of nonhazardous zinc phosphate sludge waste are accumulated in the Main Building Nonhazardous Waste Accumulation Area (SWMU 11).



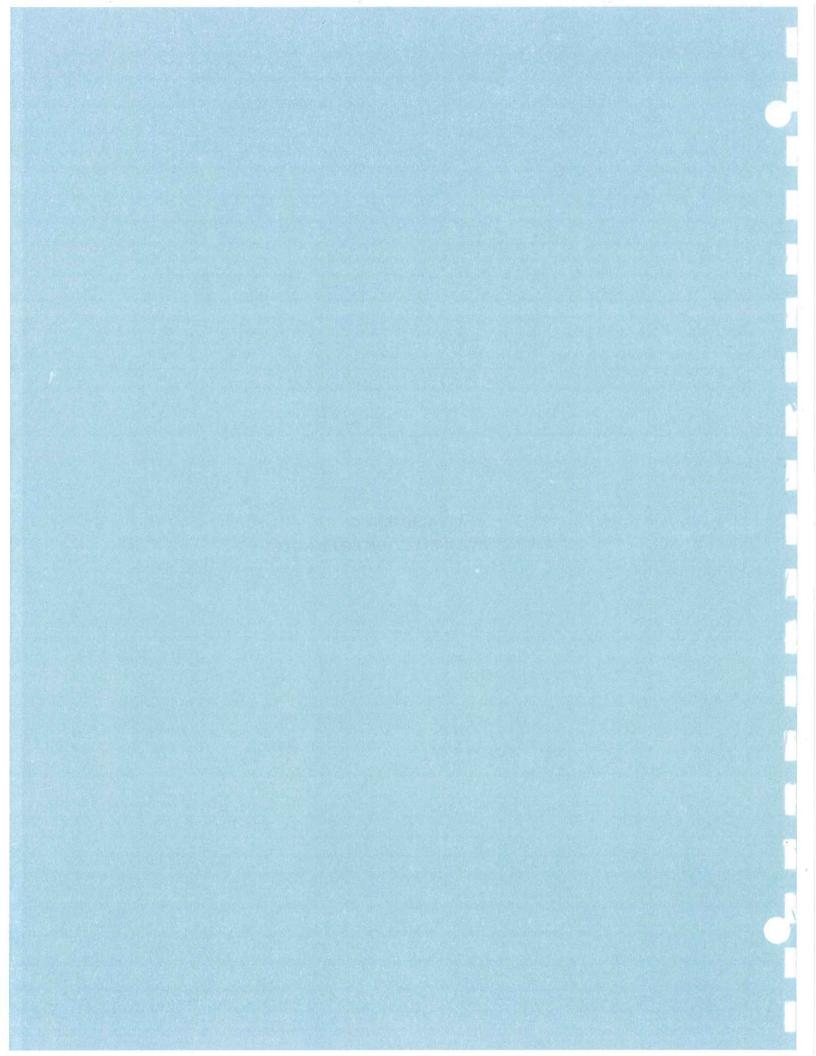
Photograph No. 14 Orientation: Southwest Location: SWMU 12 Date: 12/02/92

Description: A covered 55-gallon drum collects hazardous roll grindings dust and is located

directly underneath a baghouse unit.

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ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

November 13, 1992

Mr. Ronald Jandrokovic Plant Engineer Pittsburgh-Canfield Corporation P.O. Box 556 Canfield, Ohio 44406

Re:

Visual Site Inspection
Pittsburgh-Canfield Corporation
Canfield, Ohio
OHD 000 810 283

Dear Mr. Jandrokovic:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for December 2, 1992, at 9:30 a.m. The inspection team will consist of Peter Lynch and Cathy Collins of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Ohio Environmental Protection Agency (OEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

Mr. Ronald Jandrokovic November 13, 1992 Page 2

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Kevin M. Pierard, Chief

OH/MN Technical Enforcement Section

Enclosure

cc: Dave Wertz, OEPA - Twinsburg

Ed Lim, OEPA - Columbus

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that
 U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

- I. Two copies of a detailed map of the facility
- 2. Facility history, including dates of operation, ownership changes, and production processes
- 3. Current facility operations
- 4. Processes that generate waste that is treated, stored, or disposed of at the facility
- 5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
- 6. Security at the facility
- 7. Information regarding geology and the uses of ground water and surface water in the area
- 8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
- 9. Records of any spills that may have occurred at the facility
- 10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Ron Jandrokovic Pittsburgh-Canfield Corporation 460 West Main Street Canfield, Ohio 44406

Re:

Visual Site Inspection
Pittsburgh-Canfield Corporation
Canfield, Ohio
OHD 000 810 283

Dear Mr. Jandrokovic:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief

Minnesota/Ohio Technical Enforcement Section

RCRA Enforcement Branch

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:

HRE-8J

November 13, 1992

Mr. Ronald Jandrokovic
Plant Engineer
Pittsburgh-Canfield Corporation
P.O. Box 556
Canfield, Ohio 44406

Re:

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Canfield, Ohio OHD 000 810 283

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Mr. Ronald Jandrokovic November 13, 1992 Page 2

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Sincerely yours,

Kevin M. Pies d, Chief

OH/MN Technical Enforcement Section

Enclosure

cc: Dave Wertz, OEPA - Twinsburg

Ed Lim, OEPA - Columbus